

UNITED STATES DISTRICT COURT
for the
Western District of Washington

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address))
Case No. MJ22-572
Eight (8) Target Locations and Six (6) Target Vehicles,)
as more fully described in Attachment A.)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Eight (8) Target Locations and Six (6) Target Vehicles, as more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
 - contraband, fruits of crime, or other items illegally possessed;
 - property designed for use, intended for use, or used in committing a crime;
 - a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Distribution of, and Possession with Intent to Distribute, Controlled Substances
21 U.S.C. § 841 & 846	Conspiracy to Distribute Controlled Substances
18 U.S.C. § 922	Felon in Possession of Firearms

The application is based on these facts:

- See Affidavit of DEA Special Agent Joseph Cheng, continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: by reliable electronic means; or telephonically recorded.

Applicant's signature

Joseph Cheng, DEA Special Agent

Printed name and title

- The foregoing affidavit was sworn to before me and signed in my presence, or
 The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 11/28/22

M. Johnson Judge

Judge's signature

Michelle L. Peterson, United States Magistrate Judge

Printed name and title

1 **ATTACHMENT A**

2 **PROPERTY TO BE SEARCHED**

3

4 The areas to be searched includes all areas at that location where the Items to Be
5 Seized, listed in Attachment B, could be found.

6 For physical locations, this includes all areas within and surrounding the primary
7 residence/location, including all rooms, attics, crawlspaces, basements, storage areas,
8 containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding,
9 patios, balconies, yards, secure locations (such as safes), and vehicles located within
10 said property or within the residence/location described below.

11 For vehicles to be searched, this includes all areas of the vehicle, all
12 compartments, and all containers within that vehicle, whether locked or not.

Residences

Target Location 2 (TL2): 6225 84th Place Northeast, Marysville, Washington.

Target Location 2 is a single floor single family residence. The numbers 6225 are affixed vertically to a post near the front door. The red front door faces west into the cul-de-sac. The house is light blue and cream colored with white trim.



1 **Target Location 3 (TL3): 18111 25th Avenue Northeast, Apartment FF105,**
2 **Marysville, Washington.**

3 **Target Location 3** is a two story middle unit in a multi-residence townhome
4 building. Target Location 4 has tan siding with white and gray trim. The garage door
5 is mixed white and gray in color and faces east toward Gregory Landing Lane.
6 "FF105" is affixed to the building next to the garage door. The front door faces south.
7



1 | **Target Location 4 (TL4): 3374 Robertson Road, Bellingham, Washington.**

2 | **Target Location 4** is on the east side of Robertson Road and is a two story
3 | single family residence. The residence is blue/gray in color with white trim. The
4 | numbers 3374 are affixed above the garage doors. A double and single garage door and
5 | a mostly glass front door face Robertson Road.



1 **Target Location 5 (TL5): 2100 Alabama Street Apartment V8, Bellingham,**
2 **Washington.**

3 **Target Location 5** is an apartment complex named the Crimson Hills
4 Townhomes at the intersection of Alabama Street and Woburn Street. Apartment V8 is
5 two stories and faces west toward Valencia Street. V8 is affixed to a post next to a
6 wooden gate across the entry to the residence.



1 | **Target Location 6 (TL6): 1511 Willowbrook Place, Bellingham, Washington.**

2 | **Target Location 6** is a single family residence at the end of Willowbrook Place.
3 | The black numbers 1511 are affixed to a white board next to the front door. The house
4 | is tan in color with white trim. The red front door and white garage door both face east
5 | toward Willowbrook Place.



1 | **Target Location 7 (TL7): 4076 Jones Lane, Bellingham, Washington**

2 | **Target Location 7** is a two story single-family residence that is dark in color
3 | with light colored trim. **Target Location 7** is at the end of a long driveway off of Jones
4 | Lane. A dark color garage door and dark colored front door with glass panes face Jones
5 | Lane to the west. A small outbuilding sits at the end of the driveway nearest to Jones
6 | Lane.



1 **Target Location 8 (TL8): 2100 Halleck Street, Bellingham, Washington**

2 **Target Location 8** is a single family single floor residence, cream in color with
3 a brown roof and is located on the east side of the intersection of I Street and Halleck
4 Street. The number 2100 are affixed next to the front door of the residence that faces
5 Halleck Street. The front door is brown in color.



1 | **Target Location 9 (TL9): 1512 Iron Street, Bellingham, Washington.**

2 | **Target Location 9** is a one-story single family residence located on the east side
3 | of Iron Street. The house is gray/blue in color with white trim and a white with glass
4 | panels front door facing west. The number 1512 are affixed to the residence next to the
5 | front door.



22 | For this location, search is only authorized for areas that CASEY LANDIS has direct
23 | access, including his personal room or rooms and any common areas (including
24 | bathrooms, kitchen, and living areas) to which he has access. Search is not authorized
25 | for rooms that CASEY LANDIS does not have direct access (including bedrooms
26 | associated with other individuals).

Vehicles

Target Vehicle 1 (TV1): a 2019 Toyota Tacoma bearing Washington license plate C88437V (hereinafter, “**Target Vehicle 1**”). According to the Washington State Department of Licensing (“DOL”), **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESCA, at 1628 North 26th Street, Apartment 205 in Mount Vernon, Washington.

Target Vehicle 4 (TV4): a 2017 white BMW 540 sedan bearing Washington license plate CCV6269 (hereinafter, “**Target Vehicle 4**”). According to the DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESCA at 6225 84th PL NE, Marysville, Washington.

Target Vehicle 5 (TV5): a 2012 black Lexus IS sedan bearing Washington license plate BSU8484 (hereinafter, “**Target Vehicle 5**”). According to the DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

Target Vehicle 6 (TV6): a 2015 white Dodge Durango bearing Washington license plate BUJ0115 (hereinafter “**Target Vehicle 6**”). According to the DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESCA at 1628 North 26th Street Apartment 205, Mount Vernon, Washington 98273.

Target Vehicle 7 (TV7): a 2017 black BMW 440i sedan, bearing Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

Target Vehicle 9 (TV9): a 2016 Mercedes sedan, bearing Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for and seize the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and Possession with Intent to Distribute Controlled Substances, in violation of Distribution of, and Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. § 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, and Felon in Possession of a Firearm, in Violation of 18 U.S.C. 922, including but not limited to the following:

1. Controlled Substances: Including but not limited to marijuana and cocaine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, “pay/owe sheets” with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property

occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

- d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
- e. Collection accounts: statements and other records.
- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and

other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries, iPhones and other smartphones may be seized but may only be searched pursuant to a subsequent warrant.

1 **AFFIDAVIT OF JOSEPH CHENG**

2 STATE OF WASHINGTON)
3)
4 COUNTY OF WHATCOM)

5 I, Joseph Cheng, being first duly sworn on oath, depose and say:

6 **INTRODUCTION AND AGENT BACKGROUND**

7 1. I am a law enforcement officer of the United States within the meaning of
8 18 U.S.C. § 2510(7) and empowered by law to conduct investigations of, and to make
9 arrests for, offenses enumerated in 18 U.S.C. § 2516.

10 2. I am a Special Agent (SA) with the Drug Enforcement Administration
11 (DEA), United States Department of Justice. I have been so employed since August
12 2006. In connection with my official DEA duties, I investigate criminal violations of
13 the federal narcotics laws, including but not limited to, Title 21, United States Code,
14 Sections 841, 843, 846, and 848. I am currently assigned to the Bellingham Resident
15 Office of the DEA's Seattle Field Division. My current assignment involves
16 investigations of high-level drug trafficking organizations within the Western
17 Washington area and elsewhere.

18 3. I have completed the DEA Basic Agent Training Course as well as other
19 training courses related to gangs and narcotics trafficking. I have participated in
20 narcotics investigations at both the local and federal level, and I have participated in
21 numerous federal search warrants. As a result, I have become familiar with methods of
22 operation of drug traffickers and organizations. As a Special Agent with the DEA, I
23 have the responsibility of working with other federal and state law enforcement officers
24 in investigations of violations of federal and state controlled substance laws, including
25 the investigation of the distribution of controlled substances including fentanyl and its
26 analogues, cocaine, methylenedioxymethamphetamine (MDMA), methamphetamine,
27 heroin, marijuana, and other dangerous drugs.

1 4. I have interviewed numerous drug dealers, drug users, and knowledgeable
 2 confidential informants about the lifestyles, appearances, and habits of drug dealers and
 3 users. I have become familiar with the manner in which narcotics traffickers smuggle,
 4 package, transport, store, and distribute narcotics, as well as how they collect and
 5 launder drug proceeds. I am also familiar with the manner in which narcotics
 6 traffickers use telephones, cellular telephone technology, internet, pagers, coded
 7 communications and slang-filled conversations, false and fictitious identities, and other
 8 means to facilitate their illegal activities and mislead law enforcement investigations. I
 9 have had discussions with other law enforcement personnel about the packaging and
 10 preparation of narcotics, the methods of illegal narcotics traffickers, and the security
 11 measures that narcotics traffickers often employ. I have examined narcotics customers'
 12 supplier lists, pay/owe ledgers maintained by traffickers, and other documentation
 13 related to narcotics trafficking. I have also examined documentation of various
 14 methods by which methamphetamine, cocaine, marijuana, heroin, and other illicit drugs
 15 are smuggled, transported, and distributed. I have participated in hundreds of hours of
 16 surveillance of narcotics traffickers. During surveillance, I have personally observed
 17 narcotics transactions, counter surveillance techniques, and the ways in which narcotics
 18 traffickers conduct clandestine meetings.

19 5. I have also participated in investigations that involved the interception of
 20 wire communications, including four investigations of large-scale drug trafficking
 21 organizations in which I was the case agent and each of which resulted in the conviction
 22 of approximately 20 individuals on federal drug-related charges. In addition to these
 23 cases, I have participated in numerous other wiretap investigations in a variety of roles,
 24 including by conducting physical surveillance and monitoring intercepted
 25 communications. I have been directly involved in the review and deciphering of
 26 intercepted coded conversations between narcotics traffickers that were later
 27 corroborated by surveillance or by targets' statements. Throughout my law
 28

1 enforcement career, I have spoken with, worked with, and gained knowledge from
 2 numerous experienced federal, state, and local narcotics officers.

3 **PURPOSE OF THIS AFFIDAVIT**

4 6. I make this affidavit in support of an application for a warrant authorizing
 5 the search of the following target locations and target vehicles, which are further
 6 described below and in Attachment A, for evidence, fruits and instrumentalities of the
 7 crimes of Distribution of, and Possession with Intent to Distribute, Controlled
 8 Substances (21 U.S.C. § 841(a)) and Conspiracy to Distribute Controlled Substances
 9 (21 U.S.C. § 846), as further described in Attachment B:

10 a. **Target Location 2 (TL2): 6225 84th Place Northeast,
 11 Marysville, Washington:** Target Location 2 is a single floor single family residence.
 12 The numbers 6225 are affixed vertically to a post near the front door. The red front
 13 door faces west into the cul-de-sac. The house is light blue and cream colored with
 14 white trim.

15 b. **Target Location 3 (TL3): 18111 25th Avenue Northeast,
 16 Apartment FF105, Marysville, Washington:** Target Location 3 is a two story middle
 17 unit in a multi-residence townhome building. Target Location 4 has tan siding with
 18 white and gray trim. The garage door is mixed white and gray in color and faces east
 19 toward Gregory Landing Lane. "FF105" is affixed to the building next to the garage
 20 door. The front door faces south.

21 c. **Target Location 4 (TL4): 3374 Robertson Road, Bellingham,
 22 Washington:** Target Location 4 is on the east side of Robertson Road and is a two
 23 story single family residence. The residence is blue/gray in color with white trim. The
 24 numbers 3374 are affixed above the garage doors. A double and single garage door and
 25 a mostly glass front door face Robertson Road.

26 d. **Target Location 5 (TL5): 2100 Alabama Street Apartment V8,
 27 Bellingham, Washington:** Target Location 5 is an apartment complex named the
 Crimson Hills Townhomes at the intersection of Alabama Street and Woburn Street.
 Apartment V8 is two stories and faces west toward Valencia Street. V8 is affixed to a
 28 post next to a wooden gate across the entry to the residence.

29 e. **Target Location 6 (TL6): 1511 Willowbrook Place,
 30 Bellingham, Washington:** Target Location 6 is a single family residence at the end of
 31 Willowbrook Place. The black numbers 1511 are affixed to a white board next to the
 32 front door. The house is tan in color with white trim. The red front door and white
 33 garage door both face east toward Willowbrook Place.

1 f. **Target Location 7 (TL7): 4076 Jones Lane, Bellingham,**
 2 **Washington:** Target Location 7 is a two story single-family residence that is dark in
 3 color with light colored trim. Target Location 7 is at the end of a long driveway off of
 4 Jones Lane. A dark color garage door and dark colored front door with glass panes face
 Jones Lane to the west. A small outbuilding sits at the end of the driveway nearest to
 Jones Lane.

5 g. **Target Location 8 (TL8): 2100 Halleck Street, Bellingham,**
 6 **Washington:** Target Location 8 is a single family single floor residence, cream in
 7 color with a brown roof and is located on the east side of the intersection of I Street and
 Halleck Street. The number 2100 are affixed next to the front door of the residence that
 faces Halleck Street. The front door is brown in color.

8 h. **Target Location 9 (TL9): 1512 Iron Street, Bellingham,**
 9 **Washington:** Target Location 9 is a one-story single family residence located on the
 10 east side of Iron Street. The house is gray/blue in color with white trim and a white
 11 with glass panels front door facing west. The number 1512 are affixed to the residence
 next to the front door..

12 i. **Target Vehicle 1 (TV1):** a 2019 Toyota Tacoma bearing
 13 Washington license plate C88437V (hereinafter, “**Target Vehicle 1**”). According to
 14 the Washington State Department of Licensing (“DOL”), **Target Vehicle 1** is
 15 registered to ANJELICA J LOPEZ VILLESCA, at 1628 North 26th Street, Apartment
 16 205 in Mount Vernon, Washington. Investigators believe that **TV1** is being used by
 17 ENOC MARTINEZ LOPEZ (“MARTINEZ”) and others to facilitate drug trafficking
 activities.

18 j. **Target Vehicle 4 (TV4):** a 2017 white BMW 540 sedan bearing
 19 Washington license plate CCV6269 (hereinafter, “**Target Vehicle 4**”). According to the
 DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESCA at 6225 84th
 PL NE, Marysville, Washington. Investigators believe that **TV4** is being used by ENOC
 20 MARTINEZ LOPEZ (“MARTINEZ”) to facilitate drug trafficking activities.

21 k. **Target Vehicle 5 (TV5):** a 2012 black Lexus IS sedan bearing
 22 Washington license plate BSU8484 (hereinafter, “**Target Vehicle 5**”). According to the
 23 DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St,
 Apt 101, Mount Vernon, Washington. Investigators believe that **TV5** is being used by
 24 ENOC MARTINEZ LOPEZ (“MARTINEZ”) to facilitate drug trafficking activities.

25 l. **Target Vehicle 6 (TV6):** a 2015 white Dodge Durango bearing
 26 Washington license plate BUJ0115 (hereinafter “**Target Vehicle 6**”). According to the
 27 DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESCA at 1628 North
 26th Street Apartment 205, Mount Vernon, Washington 98273. Investigators believe
 28 that **TV6** is being used by Enoc MARTINEZ LOPEZ to facilitate drug trafficking
 activities.

1 m. **Target Vehicle 7 (TV7)**: a 2017 black BMW 440i sedan, bearing
 2 Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the
 3 DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave
 4 NE, Apt FF105, Marysville, Washington 98271. Investigators believe that **TV7** is
 being used by ENOC MARTINEZ LOPEZ and MANUEL GARCIA MUÑOZ to
 facilitate drug trafficking activities.

5 n. **Target Vehicle 9 (TV9)**: a 2016 Mercedes sedan, bearing
 6 Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the
 7 DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit
 A409, Lynnwood, Washington 98037. Investigators believe that **TV9** is being used by
 ENOC MARTINEZ LOPEZ to facilitate drug trafficking activities.

9 7. For each of the Target Locations, authority to search extends to all parts
 10 of the property, including main structure, garage(s), storage structures, outbuildings,
 11 and curtilage, and all vehicles, containers, compartments, or safes located on the
 12 property, whether locked or not, where the items described in Attachment B could be
 13 found. For each Target Location described as an apartment, authority to search extends
 14 to all storage areas associated with the apartment, including on-site storage lockers,
 15 garages, and parking stalls. For each Target Vehicle searched, authority to search
 16 extends to all parts of the vehicle and any cases, containers, compartments, or safes
 17 located in the vehicle, whether locked or not, where the items described in Attachment
 18 B could be found.

19 8. During the execution of this warrant, to secure the premises, agents may
 20 use an unmanned aircraft equipped with a video camera to conduct a cursory visual
 21 inspection (“sweep”) of those places inside the residence that agents are to search and
 22 in which a person might be hiding. The aircraft would provide live images of those
 23 places to be searched, including those in the interior of the house. The unmanned
 24 aircraft does not have recording capability. Use of this capability promotes civilian and
 25 officer safety by providing agents with information about the presence or absence of
 26 people and/or weapons in portions of the premises prior to entering those areas
 27 themselves.

SUMMARY OF PROBABLE CAUSE¹

Summary of Investigation

3 9. As explained further below, the United States, including the DEA, is
4 conducting a criminal investigation regarding possible violations of Distribution of, and
5 Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C.
6 § 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute,
7 Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in Skagit
8 County, Whatcom County, and elsewhere. During the course of the investigation,
9 investigators initially identified Enoc MARTINEZ LOPEZ as a primary source of
10 supply of cocaine, and subsequently found him also to be a source of supply of
11 fentanyl, methamphetamine, and heroin. By reviewing data obtained pursuant to state
12 and federal search warrants, investigators have learned that MARTINEZ LOPEZ and
13 his associates use cellular phones and various mobile applications to conduct their drug
14 distribution business. MARTINEZ LOPEZ has communicated about drug sales via the
15 application “Snapchat” and via his cellular provider’s Short Message Service (SMS), he
16 has collected money in exchange for drugs via the application “Cash App,” and has
17 stored photographs of drugs on his Google account. Individuals associated with ENOC
18 MARTINEZ LOPEZ who purchase controlled substances from him, or who redistribute
19 controlled substances for him, include: Manuel GARCIA MUÑOZ, Casey LANDIS,
20 Adam WISNIEWSKI, and Jesse WITTEVEEN. Another individual, Corbin
21 SAUNDERS is a felon who was found in possession of two firearms during this
22 investigation

23 //

24 //

²⁷ ²⁸ ¹ For ease of reading and to avoid repetition, this summary of probable cause is broken into sections describing events, locations, and vehicles. However, it is my intent that the affidavit be read as a whole, with the facts set forth in each section and subsection supporting probable cause for all relevant locations and vehicles for which permission is being sought to search.

1 | Tracking Warrants for Phones and Vehicles

2 | 10. Investigators have received multiple judicial authorizations to track
 3 | multiple vehicles and phones used by MARTINEZ LOPEZ and associates of
 4 | MARTINEZ LOPEZ. Only the most recent orders are described below.

5 | 11. On September 2, 2022, US Magistrate Judge Paula McCandlis signed a
 6 | warrant for prospective location information (PLI) and a pen register/trap and trace
 7 | order for Target Telephones 10 through Target Telephone 30. In early September
 8 | investigators served those warrants for location data. On September 6, 2022,
 9 | investigators began receiving location information for some of the Target Telephones.

10 | 12. On September 16, 2022, US Magistrate Judge Paula McCandlis signed a
 11 | warrant authorizing the use of a cell site simulator to located 17 of the Target
 12 | Telephones listed in the PLI warrant described above.

13 | 13. To date, investigators have utilized the cell site simulator and location
 14 | data to track, locate and identify multiple members of the MARTINEZ LOPEZ DTO.
 15 | Some of the cell phone location information and cell site simulator usage is described
 16 | below.

17 | 14. On September 29, 2022, US Magistrate Judge Paula McCandlis signed a
 18 | tracking warrant authorizing the tracking of **TV1, TV3, TV4, and TV5**. Investigators
 19 | have utilized the listed tracking devices to track the whereabouts of MARTINEZ
 20 | LOPEZ and Manuel GARCIA MUÑOZ. The tracking devices have enable
 21 | investigators to identify new residences of MARTINEZ LOPEZ's drug trafficking
 22 | associates. Some of the tracking information is described below.

23 | 15. On October 31, 2022, US Magistrate Judge Paula McCandlis signed a
 24 | warrant for prospective location information and pen register/trap and trace for 12 cell
 25 | phones, many of which are discussed below. Additionally authorized at this time was
 26 | location tracking for **TV1, TV3, TV4, TV5, TV6 and TV7**. As discussed below,
 27 | investigators have observed MARTINEZ LOPEZ drive numerous vehicle during his

28 |

1 drug trafficking activities and MARTINEZ LOPEZ does not appear to have any
 2 discernable pattern to which vehicle he drives on any given day.

3 April 18, 2022 Arrest of Adam WISNIEWSKI

4 16. On April 18, 2022, investigators were conducting surveillance of Enoc
 5 MARTINEZ LOPEZ at the Silver Reef Casino in Whatcom County. Investigators
 6 observed an individual, later identified as Adam WISNIEWSKI get into MARTINEZ
 7 LOPEZ's gray Toyota pickup truck (TV1). Investigators followed MARTINEZ
 8 LOPEZ and WISNIEWSKI to a nearby gas station, where they remained a short
 9 amount of time before returning the Silver Reef Casino. Investigators observed
 10 WISNIEWSKI get out of the MARTINEZ LOPEZ's pickup truck (TV1) and
 11 MARTINEZ LOPEZ drive away from the area. A short while later, as WISNIEWSKI
 12 was walking away from the Silver Reef Casino, investigators observed WISNIEWSKI
 13 discard an object onto the ground. Investigators recovered this object which they
 14 determined to be blue pills marked "M30," which they believed to be fentanyl pills.
 15 WISNIEWSKI was then arrested. During a search incident to arrest, investigators
 16 recovered approximately 233 gross grams of suspected fentanyl pills, 68.75 gross grams
 17 of fentanyl powder², which was purple in color and a firearm (Harrington & Richardson
 18 [Heckler & Koch], Model HK4, serial number HR06139) amongst other items.
 19 WISNIEWSKI was released after the interview discussed below.

20 17. In a post Miranda statement, WISNIEWSKI told investigators that he had
 21 met "V" earlier in the day and obtained 1,000 "blues" and a sample of fentanyl powder,
 22 which was purple in color. Based on the investigation to date, investigators know that
 23 MARTINEZ LOPEZ goes by "Victor" with some of his drug trafficking associates.
 24

25
 26 ² Due to its potency, potential for accidental exposure and other officer safety concerns, investigators do not
 27 routinely field test fentanyl. In some select instances, investigators have the equipment necessary to safely field
 28 test fentanyl and for those instances it is documented as such. When a seized substance has not been field tested
 but is identified as fentanyl, this determination is based on the training and experience of the officer, the
 appearance of the pills or powder in question, and the context of the seizure itself.

1 Based on training and experience, I know that “blues” is commonly used code for
 2 fentanyl pills marked “M30.”

3 June 23, 2022 Arrest of Adam WISNIEWSKI

4 18. On June 23, 2022, Everson Police Department, assisted by Whatcom
 5 County Deputies, arrested WISNIEWSKI in Everson, Whatcom County. Found in
 6 WISNIEWSKI’s possession at the time of his arrest were two firearms (Sig Sauer,
 7 Model P320 Carry, serial number 58B025078, and a Ruger, Model LC9S, serial
 8 number 329-54468) and approximately 60 gross grams of pills marked “M30,”
 9 suspected to contain fentanyl. In the vehicle at time of WISNIEWSKI’s arrest was
 10 Jessica SWOPE. WISNIEWSKI requested to speak with a Drug Task Force Detective.

11 19. In a post Miranda statement, WISNIEWSKI provided information about
 12 “V” or “Victor” who was a drug supplier. WISNIEWSKI showed investigators a
 13 contact stored in his phone as “Big Dog V” with the phone number 360-982-8719
 14 (TT10), which WISNIEWSKI said was for “Victor.” As discussed above, investigators
 15 believe “Victor” to be the MARTINEZ LOPEZ and MARTINEZ LOPEZ to be the user
 16 of 360-982-8719 (TT10).

17 Search Warrant on Verizon Wireless accounts 360-982-8719 (TT10) and 206-573-2914

18 20. On August 12, 2022, US Magistrate Judge Brian A Tsuchida signed a
 19 search warrant authorizing the search for records related to Verizon Wireless records
 20 related to 360-982-8719 (TT10) and 206-573-2914, both believed to be used by Enoc
 21 MARTINEZ LOPEZ. Investigators subsequently served this warrant on Verizon
 22 wireless. On August 22, 2022, investigators received records from Verizon Wireless.
 23 No SMS content was received for 206-573-2914. SMS content was received for 360-
 24 982-8719 (TT10) and these messages ranged from June 30, 2022, through August 12,
 25 2022, with several multi day gaps in between the records. Some of the messages
 26 received pursuant to this search warrant are discussed in the sections below.

27
 28

1 21. According to Verizon Wireless records, 360-982-8719 (TT10) is
 2 subscribed to Vic MARTINEZ at 1628 North 26th Street, Mount Vernon, Washington
 3 98273 with an activation date of May 16, 2022.

4 August 31, 2022 Controlled Purchase from MARTINEZ LOPEZ

5 22. On August 31, 2022, a Whatcom Gang and Drug Task Force (WGDTF)
 6 Confidential Source (CS5)³ met with investigators to attempt to purchase 1,000 fentanyl
 7 pills and one ounce of heroin from MARTINEZ LOPEZ. CS5 spoke to MARTINEZ
 8 LOPEZ telephonically to arrange the controlled purchase. Investigators searched CS5
 9 and CS5's vehicle for contraband and none was found. CS5 was provided \$2,150 in
 10 pre-recorded buy funds. Investigators followed CS5 to the meeting location in
 11 Whatcom County and CS5 was not observed meeting with any other individuals prior
 12 to meeting with MARTINEZ LOPEZ. CS5 met with MARTINEZ LOPEZ who was
 13 driving a black Lexus (WA/BSU8484) (**Target Vehicle 5**). After the meeting
 14 investigators followed CS5 to a pre-determined location, where investigators were
 15 given approximately 197 gross grams of suspected fentanyl pills and 55 gross grams of
 16 suspected heroin from CS5. CS5 and CS5's vehicle were searched for contraband and
 17 none was found.

18 Messages between MARTINZ LOPEZ and WITTEVEEN (TT21)

19 23. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in
 20 contact with 360-603-1960 (TT21) used by Jesse WITEVEEN approximately 144 times
 21 between July 26, 2022, and August 19, 2022.

22 24. On July 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-
 23 1960 (TT21) exchanged the following messages:

24
 25
 26 ³ CS5 has prior felony convictions for a controlled substance violations and attempting to elude. CS5 is working
 27 in exchange for charges related to a recent State of Washington arrest not being filed. During a surveillance
 28 conducted in October 2022, investigators observed the vehicle used by CS5 during this controlled purchase and
 the controlled purchase on November 9, 2022 at a Bellingham residence that MARTINEZ LOPEZ was observed
 at. Investigators did not see CS5 at that residence or in that vehicle during that October 2022 surveillance.

1	7/30/2022 19:57	Incoming	3606031960	"Hey I want 2 of blue berry's boats and 1 of upper "
2	7/30/2022 20:20	Outgoing	3606031960	"Ok"
3	7/30/2022 20:58	Incoming	3606031960	"Where are we meeting at "
4	7/30/2022 20:59	Incoming	3606031960	"How long "
5	7/30/2022 21:20	Outgoing	3606031960	"Come to Marysville "
	7/30/2022 21:29	Incoming	3606031960	"I was two off sorry"
	7/30/2022 21:45	Incoming	3606031960	"Where are we meeting at "

6 25. Based on training and experience, I know that "blue berry" is commonly
 7 used code for "m30" pills, typically containing fentanyl, "boat" is commonly used code
 8 for 1,000 pills and "upper" is likely code for some sort of stimulant, possibly cocaine or
 9 methamphetamine. In this conversation, investigators believe that MARTINEZ LOPEZ
 10 and the user of 360-603-1960 (TT21) ultimately meet for MARTINEZ LOPEZ to
 11 provide 2,000 fentanyl pills and 1 unit of some type of drug to the user of 360-603-1960
 12 (TT21).

13 26. On August 1 and 2, 2022, MARINEZ LOPEZ (TT10) and the user of
 14 360-603-1960 (TT21) exchanged the following messages:

15	8/1/2022 22:13	Incoming	3606031960	"I'm ready with 10"
16	8/1/2022 22:16	Outgoing	3606031960	"Ok I'm in burlington"
17	8/1/2022 22:20	Incoming	3606031960	"I'm on my way "
18	8/1/2022 22:40	Incoming	3606031960	"And can I use a duffle bag "
	8/1/2022 22:40	Incoming	3606031960	"I forgot mine "
19	8/1/2022 22:40	Outgoing	3606031960	"Give me 30 min bro I'm coming down from the mountains "
20	8/1/2022 22:41	Incoming	3606031960	"OK I just am leaving bham"
21	8/1/2022 23:05	Incoming	3606031960	" What's up home "
22	8/1/2022 23:05	Incoming	3606031960	"Homie"
23	8/1/2022 23:06	Incoming	3606031960	"Where am I going "
24	8/1/2022 23:07	Outgoing	3606031960	"Mount vernon"
25	8/1/2022 23:07	Incoming	3606031960	"OK where "
26	8/1/2022 23:14	Outgoing	3606031960	"Same apartments bro "
27	8/1/2022 23:14	Outgoing	3606031960	"1521 n 26th st "
28	8/1/2022 23:14	Incoming	3606031960	"In Burlington "
	8/1/2022 23:58	Outgoing	3606031960	"Counted 9,475"
	8/1/2022 23:58	Incoming	3606031960	"Really "
	8/1/2022 23:58	Incoming	3606031960	"Can't be "

1	8/1/2022 23:59	Outgoing	3606031960	"It is 1125 added to the bill"
2	8/2/2022 0:01	Outgoing	3606031960	"2,025 last bill + 1,125= 3150 new bill"

27. Based on training and experience, I believe that "10" is reference to
\$10,000 that the user of 360-603-1960 (TT21) is going to provide to MARTINEZ
LOPEZ for the purchases of obtaining drugs. Based on the conversation, investigators
believe that the two individuals met and the user of 360-603-1960 (TT21) provided
MARTINEZ LOPEZ \$9,475, was provided an unknown quantity of drugs and owed
MARTINEZ LOPEZ \$3,150 for drugs provided to the user of 360-603-1960 (TT21)

28. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-
1960 (TT21) exchanged the following messages:

8/12/2022 20:40	Outgoing	3606031960	"10 min away"
8/12/2022 20:54	Incoming	3606031960	"Hey you dump truck i got 1200 more so 5100 i need three boats and one p of other"
8/12/2022 20:55	Outgoing	3606031960	"I'm pulling up"

29. Based on training and experience, I believe that the user of 360-603-1960
(TT21) told MARTINEZ LOPEZ that they had \$5,100 for MARTINEZ LOPEZ and
wanted 3,000 fentanyl pills and one "p," likely one pound, of another type of drug.

30. In October 2022, investigators recognized that WITTEVEEN stopped
using TT21 and identified 360-660-4383 as WITTEVEEN's new number. On October
11, 2022, a Whatcom County Superior Court Judge approved a search warrant and
court order authorizing investigators to obtain location information for WITTEVEEN's
360-660-4383. Investigators served the warrant and began receiving information
shortly thereafter.

November 1 & 2, 2022 Surveillance of MARTINEZ LOPEZ and Jesse WITTEVEEN
and recovery of 959 gross grams of methamphetamine and 346 gross grams of
suspected fentanyl pills discarded by WITTEVEEN.

31. On November 1, 2022, investigators conducted surveillance on
MARTINEZ LOPEZ. Investigators observed that MARTINEZ LOPEZ was driving his
white BMW (TV4). Investigators followed MARTINEZ LOPEZ from his residence in
Marysville, Washington to a business parking lot in Marysville, Washington where

1 investigators observed MARTINEZ LOPEZ meet with the occupant of another vehicle
 2 for a short period of time, discussed below. Based on training and experience,
 3 investigators believe that this was a drug transaction conducted by MARTINEZ
 4 LOPEZ. Investigators observed MARTINEZ LOPEZ's white BMW (**TV4**) drive away
 5 from the parking lot, investigators did not follow the white BMW (**TV4**). A short while
 6 later, investigators observed the white BMW parked in front of 18111 25th Avenue
 7 Northeast, Apartment FF105, Marysville, Washington (**Target Location 3**). Based on
 8 this investigation, investigators know that MARTINEZ LOPEZ frequents this address
 9 before and after drug transactions.

10 32. Investigators observed MARTINEZ LOPEZ's white BMW (**TV4**) depart
 11 the area of Apartment FF105 (**Target Location 3**) and drive toward Mount Vernon,
 12 Washington. Investigators followed MARTINEZ LOPEZ's white BMW to several
 13 locations in Mount Vernon, Washington before temporarily losing sight of MARTINEZ
 14 LOPEZ's white BMW (**TV4**).

15 33. In the afternoon of November 1, 2022, WITTEVEEN's phone was not
 16 providing location information. At approximately 9:05 PM, investigators began
 17 receiving information for WITTEVEEN's phone and it was located in the area of 8363
 18 Holly Lane, Maple Falls, Washington (**Target Location 1**).

19 34. At approximately 10:05 PM, location data for WITTEVEEN's phone
 20 indicated that WITTEVEEN had left the area of Target Location 1. Location data for
 21 WITTEVEEN's phone later indicated that WITTEVEEN was in the area of Walmart in
 22 Mount Vernon Washington. Investigators search the area parking lots for vehicle
 23 known to be used by WITTEVEEN. Investigators observed a maroon Nissan Murano
 24 (**Target Vehicle 8**) in the Walmart parking lot and saw a male wearing a flat brimmed
 25 hat and female get into and start the Nissan Murano (**Target Vehicle 8**). Investigators
 26 then observed a white Honda sedan park next to the Nissan Murano and female get out
 27 of the white Honda and get into the rear passenger seat of the Nissan Murano. At
 28 approximately 10:51 PM, investigators observed both vehicles drive out of the parking

1 lot and shortly thereafter observed that location data for WITTEVEN's phone was
 2 travelling with the two vehicles. Investigators observed both vehicles eventually split
 3 up and investigators continued to follow to Nissan Murano (Target Vehicle 8).

4 35. Investigators followed the Nissan Murano (Target Vehicle 8) until it
 5 parked in the parking lot of an apartment complex in Mount Vernon, Washington.
 6 Investigators relocated MARTINEZ LOPEZ's white BMW (TV4) in Mount Vernon,
 7 Washington, and followed it until approximately 11:25 PM, when investigators
 8 observed it park at an apartment complex near where the Nissan Murano (Target
 9 Vehicle 8) parked. A short time later, investigators observed the Nissan Murano
 10 (Target Vehicle 8) drive toward MARTINEZ LOPEZ's white BMW (TV4).
 11 Investigators then observed the Nissan Murano (Target Vehicle 8) parked near
 12 MARTINEZ LOPEZ's white BMW. Investigators saw MARTINEZ LOPEZ standing
 13 near the Nissan Murano (Target Vehicle 8) near a male who was wearing a flat brim
 14 hat.

15 36. At approximately 11:35 PM, investigators observed MARTINEZ
 16 LOPEZ's white BMW (TV4) drive away from the apartment complex parking lot
 17 followed shortly by the Nissan Murano (Target Vehicle 8). Investigators followed the
 18 Nissan Murano (Target Vehicle 8) to a nearby gas station where investigators observed
 19 the white Honda pull in and park near the Nissan Murano (Target Vehicle 8).
 20 Investigators positively identified the male from the Nissan Murano (Target Vehicle 8)
 21 as Jesse WITTEVEEN via a booking photograph. Investigators observed both vehicles
 22 drive away from the gas station in tandem. Investigators followed both vehicles and
 23 observed both vehicles stop on the side of the road and reverse direction of travel, drive
 24 in a direction opposite their ultimate destination and drive significantly below the
 25 posted speed limit. Based on training and experience, I know that driving in this
 26 manner is consistent with conducting counter surveillance attempting to identify law
 27 enforcement surveillance units. The vehicles eventually split up and investigators
 28 continued to follow the Nissan Murano (Target Vehicle 8) into Sedro Woolley,

1 Washington where it stopped at a gas station. Investigators observed the Nissan
 2 Murano leave the gas station, drive into and stop on the side of the road in a
 3 neighborhood. Investigators lost sight of the Nissan Murano (Target Vehicle 8) as it
 4 drove north on Highway 9 toward Maple Falls, Washington. Investigators believe that
 5 the Nissan Murano was driving at a high rate of speed as investigators were unable to
 6 catch up to the Nissan Murano (Target Vehicle 8).

7 37. Sometime later, Whatcom County Deputies located the Nissan Murano
 8 (Target Vehicle 8) as it drove through Van Zandt, Washington. The most direct route
 9 between Sedro Woolley and Van Zandt is to drive north on Highway 9. Deputies
 10 attempted to stop the Nissan Murano (Target Vehicle 8) and it did not stop. In an
 11 attempt to stop the vehicle, deputies successfully deployed spike strips and the vehicle
 12 continued to drive for several miles before the vehicle was ultimately stopped. While
 13 deputies were attempting to stop the Nissan Murano (Target Vehicle 8), deputies
 14 observed a white bag being thrown out of the passenger side window of the vehicle.
 15 This occurred within Whatcom County. Deputies recovered a white bag from the
 16 approximate location where deputies observed the bag being thrown out of the Nissan
 17 Murano (Target Vehicle 8) window. This bag was found to contain approximately 959
 18 gross grams of methamphetamine, which field-tested positive for the presence of
 19 methamphetamine and 346 gross grams of fentanyl pills. The driver of the vehicle was
 20 identified as Jesse WITTEVEEN and the passenger was identified as Jennifer
 21 MCCOSKEY. Both WITTEVEEN and MCCOSKEY were booked into Whatcom
 22 County jail. The Nissan Murano (Target Vehicle 8) was towed to Whatcom County
 23 Sheriff's Office facility and secured pending a search warrant.

24 November 3, 2022 Search of WITTEVEN's Vehicle and Residence; seizure of 138
25 gross grams of fentanyl pills and approximately 174 gross grams of methamphetamine

26 38. On November 3, 2022, US Magistrate Judge Paula McCandlis signed a
 27 search warrant authorizing the search of WITTEVEN's vehicle and residence.
 28

1 39. On November 3, 2022, investigators executed the search warrant on
 2 WITTEVEN's vehicle. In a safe on the front passenger floorboard, investigators found
 3 approximately 138 gross grams of suspected fentanyl pills and approximately 174 gross
 4 grams of suspected methamphetamine. Multiple cell phones and various ammunition
 5 was also found in the vehicle.

6 40. On November 4, 2022, investigators executed the search warrant at
 7 WITTEVEN's residence. At the residence, investigators found approximately 35 gross
 8 grams of suspected methamphetamine, multiple cell phones, miscellaneous firearm
 9 parts and a significant quantity of ammunition.

10 November 9, 2022 Controlled Purchase of 170 gross grams of suspected fentanyl pills
 11 from MARTINEZ LOPEZ

12 41. On November 9, 2022, CS5 met with investigators to attempt to purchase
 13 1,000 fentanyl pills from MARTINEZ LOPEZ. Investigators searched CS5 and CS5's
 14 vehicle for contraband and none was found. CS5 was provided a concealed recording
 15 device and \$1,400 in pre-recorded buy funds. CS5 spoke to MARTINEZ LOPEZ on
 16 360-982-8719 (TT10). Investigators followed CS5 to the meeting location in Skagit
 17 County and CS5 was not observed meeting with any other individuals prior to meeting
 18 with MARTINEZ LOPEZ⁴. CS5 met with MARTINEZ LOPEZ who was driving a
 19 white Mercedes (WA/CEX6393) (**Target Vehicle 9**). After the meeting investigators
 20 followed CS5 to a pre-determined location, where investigators got approximately 170
 21 gross grams of suspected fentanyl pills and the recording devices from CS5. The CS5
 22 and CS5's vehicles were searched for contraband and none was found.
 23 //
 24 //
 25 //
 26 //

27
 28 ⁴ CS5 used the restroom in an area business and was observed by investigators while doing so.

TARGET LOCATION 2:

6225 84TH PLACE NORTHEAST, MARYSVILLE, WASHINGTON

Records related to Target Location 2

42. According to Snohomish Public Utility District Records on June 3, 2022, the customer listed for **Target Location 2** was Enoc MARTINEZ LOPEZ with a mailing address of 6225 84th Place Northeast, Marysville, Washington 98270 (**Target Location 2**). These records indicate that service started on April 2, 2022, and list a phone number of 360-488-8184.

43. Court authorized location data for MARTINEZ LOPEZ's vehicles and pole camera video indicated that most of these vehicles are parked at **Target Location 2** during the early morning hours almost every day. Investigators believe that **Target Location 2** is the residence of MARTINEZ LOPEZ.

August 22, 2021 Three pounds of cocaine seized from Target Vehicle 1

44. During summer of 2021, a court-authorized GPS tracker was installed on MARTINEZ LOPEZ's **Target Vehicle 1**. In August 2021, location information indicated that **Target Vehicle 1** had driven to California. As the vehicle detectives were alerted that the Tacoma had travelled south to California. On or about August 22, 2021, **Target Vehicle 1** was stopped in Manteca, California.

45. The driver of the Tacoma provided a false identity, though officers later learned through fingerprint records that the driver was Santiago ROBLES TEJADA. A narcotics K9 was on scene and alerted to the presence of a controlled substance in the Tacoma. Officers searched the Tacoma and located and seized approximately three pounds of cocaine that was vacuumed-sealed and wrapped in duct tape and layers of grease and plastic.

46. The Manteca officers also conducted a search warrant on ROBLES TEJADA'S cell phone. Investigators found Spanish language text messages indicating that ROBLES TEJADA was in contact with phone number 360-488-6007. Subscriber records from T-Mobile indicated that, at the time of the text messages, this phone was

1 subscribed to Enoc MARTINEZ at 1628 North 26th Street, Apartment 205, in Mount
2 Vernon, Washington. In addition, ROBLES TEJADA was also texting a contact for an
3 unknown individual listed as “QUINTERO” on phone number 206-880-8763. ROBLES
4 TEJADA and “QUINTERO” had numerous text messages appearing to use coded
5 language to discuss drug quantity and pricing.

6 47. Sometime after the traffic stop, LOPEZ VILLESCA retrieved **Target**
7 **Vehicle 1** from Manteca police. Tracking data and surveillance then showed that
8 MARTINEZ LOPEZ began to drive the Tacoma and resumed his regular meetings with
9 known drug traffickers.

10 48. According to T-Mobile records the subscriber changed the account's
11 phone number from 360-488-6007 to 360-488-8184 on or about August 26, 2021, just
12 days after the seizure of drugs from the Tacoma. Additionally, the IMEI listed for both
13 telephone numbers was 352625660856650. This indicates that MARTINEZ LOPEZ
14 simply changed his phone number without changing his actual cellular phone. As
15 discussed above, 360-488-8184 is the phone number listed on the Snohomish Public
16 Utility District records for **Target Location 2**.

TARGET LOCATION 3:

**18111 25TH AVENUE NORTHEAST APARTMENT FF105, MARYSVILLE,
WASHINGTON**

Records related to Target Location 3

49. According to Snohomish Public Utility District Records on May 20, 2022, the customer listed for **Target Location 3** was Oscar Lazaro with a mailing address of 18111 25th Avenue Northeast Apartment FF105, Marysville, Washington (**Target Location 3**). These records indicate that service started on May 19, 2022 and list a phone number of 360-399-0341.

50. According to the DOL, **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

1 51. As discussed below, in June 2022, investigators conducted a controlled
 2 purchase of heroin from GARCIA MUNOZ while GARCIA MUNOZ was driving a
 3 blue Honda Civic (Target Vehicle 3). After the controlled purchase, investigators
 4 ultimately followed GARCIA MUNOZ to **Target Location 3**. Also in June 2022,
 5 investigators observed GARCIA MUNOZ arrive in a blue Honda Civic (Target Vehicle
 6 3) and walk into **Target Location 3**. In July 2022, investigators observed the blue
 7 Honda Civic (Target Vehicle 3) parked in the garage of **Target Location 3**. Based on
 8 these observations, investigators believe that GARCIA MUNOZ lives at **Target**
 9 **Location 3**.

10 52. In addition to being GARCIA MUNOZ's residence, investigators believe
 11 that **Target Location 3** is a drug and/or money stash location for the MARTINEZ
 12 LOPEZ DTO. As discussed below, MARTINEZ LOPEZ frequently stops at **Target**
 13 **Location 3** prior to driving to Bellingham and/or Mount Vernon and conducting
 14 suspected drug transactions at various residences or parking lots.

15 June 2, 2022 US Currency seized from Armando PATINO

16 53. On June 2, 2022, investigators observed GARCIA MUÑOZ's 2018 blue
 17 Honda Civic (TV3) arrive at **Target Location 3**. Investigators then observed GARCIA
 18 MUNOZ get out of TV3, manually lift the garage door, stepped inside the garage, and
 19 close the door. A few hours later, investigators at MARTINEZ LOPEZ's residence
 20 (**Target Location 2**) observed MARTINEZ LOPEZ get into **Target Vehicle 4** and
 21 drive away. Agents followed **Target Vehicle 4** and saw it arrive at the **Target**
 22 **Location 3** and MARTINEZ LOPEZ enter the residence carrying a water bottle and a
 23 black Nike backpack. About an hour and a half later, investigators observed
 24 MARTINEZ walk out of the residence with a black shoe box with the letters "BOSS"
 25 on the side and top, and carrying what appeared to be the same Nike backpack he had
 26 earlier. He placed the shoe box on the front passenger seat of **Target Vehicle 4** and the
 27 backpack on the rear passenger seat and drove away. Agents followed **Target Vehicle**
 28 **4** to a grocery store parking lot, where it parked next to a green Mini Cooper with

1 Washington license plate BXE7471. Agents ultimately identified the driver of the Mini
 2 Cooper as Armando PATINO, and the passenger as Braulio ANTONIO GARDUNO.
 3 MARTINEZ took the “BOSS” shoebox from the front passenger seat of the white
 4 BMW and handed it to PATINO before returning to the white BMW and driving away.

5 54. As the Mini Cooper drove away from the grocery store parking lot, it was
 6 stopped. A narcotics detecting K9 alerted to the presence of narcotics the odor of
 7 narcotics emanating from the Mini Cooper. Investigators searched the Mini Cooper and
 8 found a “BOSS” shoebox contained \$29,020.00 in US Currency.

9 June 15, 2022 Controlled Purchase of Heroin from GARCIA MUNOZ

10 55. On June 15, 2022, a Whatcom County Drug and Gang Task Force
 11 (WCDGTF) Confidential Source (CS5) purchased heroin from Manuel GARCIA
 12 MUNOZ while meeting with GARCIA-MUNOZ in GARCIA MUNOZ’s blue Honda
 13 Civic (TV3) in Skagit County. Prior to the controlled buy, investigators searched CS5
 14 and CS5’s vehicle for contraband and none was found. CS5 was provided a concealed
 15 recording device and pre-recorded buy funds. Investigators followed CS5 to the
 16 meeting location in Skagit County and CS5 was not observed meeting with any other
 17 individuals prior to meeting with GARCIA MUNOZ. After the meeting investigators
 18 followed CS5 to a pre-determined location, where investigators where CS5 gave
 19 investigators approximately 56.60 gross grams of heroin and the recording device.

20 56. Agents conducted surveillance after the controlled meeting in Skagit
 21 County between CS5 and GARCIA MUNOZ, following TV3. Following the sale of
 22 heroin to CS5, GARCIA MUNOZ drove TV3 went to two other public parking areas
 23 where the vehicle stayed for approximately ten minutes at each location. Agents
 24 followed TV3 to a McDonald’s parking lot in Burlington, WA, where a white male
 25 adult wearing a red hat, driving a silver BMW sedan, entered TV3’s passenger side for
 26 less than one minute. After the white male adult left TV3, and entered his silver BMW,
 27 TV3 left the McDonald’s parking lot and agents continued to follow it until it arrived
 28 and parked at GARCIA MUNOZ’s residence (**Target Location 3**).

1 October 18, 2022 Surveillance of TV7

2 57. On October 18, 2022, investigators became aware of a new vehicle driven
 3 by MARTINEZ LOPEZ: a 2017 black BMW 440i (TV7). From October 18, 2022 to
 4 present, investigators, using a remote camera system, have observed MARTINEZ-
 5 LOPEZ in the driver's seat of this vehicle more than 10 times. On or about October 20,
 6 2022, Washington DOL indicated that the vehicle registration had changed from an
 7 uninvolved party in Blaine, WA, to Manuel GARCIA MUNOZ. DOL records indicate
 8 that TV7, Washington license plate CEN6820 is registered to MANUEL GARCIA-
 9 MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, WA, 98271 (**Target Location**
 10 **3**). Throughout this investigation, agents have observed MARTINEZ LOPEZ and
 11 GARCIA MUNOZ drive several different vehicles including the aforementioned
 12 vehicles listed in this affidavit. Investigators believe that MARTINEZ LOPEZ
 13 regularly alters vehicles to avoid detection by law enforcement and frequently changes
 14 vehicles as he does cellular phones. On October 24, 2022, MARTINEZ LOPEZ was
 15 observed entering TV7 at his residence (**Target Location 3**) and driving away.

16 Location Information for MARTINEZ LOPEZ's Vehicles

17 58. As discussed above, investigators have received court authorization on
 18 multiple occasions to track many of MARTINEZ LOPEZ's vehicles. Investigators
 19 have observed MARTINEZ LOPEZ conduct suspected drug transactions in vehicles
 20 which investigators did not have authorization to track and investigators did not have
 21 tracking devices installed on all of MARTINEZ LOPEZ's vehicle during the entire
 22 course of this investigation. While the tracking data for MARTINEZ LOPEZ's vehicle
 23 does not provide a complete account of MARTINEZ LOPEZ's travel, it gives
 24 investigators a sampling of MARTINEZ LOPEZ's travels and drug trafficking
 25 activities.

26 //

27 //

28 //

1 59. Between August 1, 2022, and November 15, 2022, MARTINEZ
2 LOPEZ's vehicles that were being tracked were within approximately 200 feet⁵ of
3 **Target Location 3**, 72 out of a possible 107 days or approximately 65% of the possible
4 days.

5 60. Investigators have observed MARTINEZ LOPEZ's vehicles go to **Target**
6 **Location 3** before or after investigators have observed MARTINEZ LOPEZ conduct
7 suspected drug transactions, to include on November 1, 2022, with WITTEVEN,
8 described above.

TARGET LOCATION 4:

3374 ROBERTSON ROAD, BELLINGHAM, WASHINGTON

Records Related to Target Location 4

12 61. According to a search of the Whatcom County Assessor's website, 3374
13 Robertson Road, Bellingham, Washington (**Target Location 4**) is owned by Marc
14 OREIRO.

15 62. According to the Washington Department of Licensing, Marc OREIRO
16 has a driver's license with a listed address of 3374 Robertson Road, Bellingham
17 Washington.

18 63. According to Puget Sound Energy, the customer of record at **Target**
19 **Location 4** is Sonya Udhe since 2019. Investigators believe that Udhe is OREIRO's
20 paramour.

Surveillance of MARTINEZ LOPEZ in TV6 at OREIRO's Residence (Target Location 4).

23 64. On September 29, 2022, investigators observed MARTINEZ LOPEZ get
24 into a white Dodge Durango (WA/BUJ0115) (**TV6**). Investigators followed
25 MARTINEZ LOPEZ in **TV6** to a residence in Bellingham where MARTINEZ LOPEZ
remained for a short amount of time. Investigators then followed MARTINEZ LOPEZ

⁵ According to Google Maps, the southbound lanes of I-5 are approximately 300 feet Target Location 3.

1 in **TV6** to 3374 Robertson Road, Bellingham, Washington (**Target Location 4**), the
 2 known residence of Marc OREIRO, where MARTINEZ LOPEZ remained for
 3 approximately 12 minutes.

4 December 2021 Information Provided by CS2 about TL4.

5 65. In December 2021, CS2⁶ provided information about an individual named
 6 Marc ORIERO and ORIERO's drug trafficking activities. CS2 stated that in November
 7 2021, CS2 saw a Hispanic Male at ORIERO's house. CS2 stated that on the same date,
 8 CS2 saw what appeared to be three gallon-sized zippered bags of crystal
 9 methamphetamine, three smaller ounce-size bags of cocaine, and several bags of pills.
 10 CS2 was shown a DOL photograph of MARTINEZ LOPEZ and a photo of **TV1**. CS2
 11 positively identified both MARTINEZ LOPEZ and **TV1** as what CS2 observed at
 12 ORIERO's residence in November 2021.

13 66. Investigators reviewed court authorized location information for **TV1**
 14 which indicated that **TV1** had visited ORIERO's residence multiple times, to include on
 15 the date indicated by CS2.

16 October 6, 2022 Controlled Purchase from Marc ORERIO

17 67. On October 6, 2022, investigators met with CS2. CS2 provided
 18 information that ORIERO was involved in the distribution of fentanyl pills, fentanyl
 19 powder, cocaine and methamphetamine on tribal lands. CS2 and CS2's vehicle were
 20 search for contraband, none was found. CS2 was provided \$500 in pre-recorded buy
 21 funds and a concealed recording device. Investigators followed CS2 to OREIRO's
 22 residence (**Target Location 4**) where they observed CS2 walk to the back of the
 23 residence and interact with an individual. CS2 remained at OREIRO's residence
 24 (**Target Location 4**) for approximately 30 minutes before investigators observed CS2
 25 depart OREIRO's residence (**Target Location 4**). Investigators followed CS2 to a pre-

26
 27 6 According to NCIC, CS2 has multiple misdemeanor convictions and has felony convictions for burglary and
 28 theft. CS2 is cooperating financial consideration. CS2's cooperation began in October 2021 and is ongoing
 through the date of this controlled purchase.

1 arranged meeting location where CS2 provided investigators approximately 27.8 gross
2 grams of pills believed to contain fentanyl and approximately 3.15 grams of suspected
3 fentanyl powder. Investigators recovered the recording devices from the CS2 and
4 searched CS2 and CS2's vehicle for contraband and none was found.

5 68. CS2 told investigators that CS2 met OREIRO in the back patio area and
6 conducted the transaction in OREIRO's garage. CS2 stated that OREIRO retrieved the
7 drugs from a shelf in the garage and counted out the drugs in the presence of CS2. CS2
8 stated that CS2 then provided OREIRO the buy funds.

Location Information for MARTINEZ LOPEZ's Vehicles

10 69. Court authorized location information for MARTINEZ LOPEZ's various
11 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 4**⁷
12 approximately 17 times, specifically on August 17, 24 and 26, 2022, September 4, 10,
13 14, 22, 23, and 25 2022, October 2, 16, 24, 28 and 29, 2022 and November 4, 6 and 7,
14 2022.

TARGET LOCATION 5:

17 2100 ALABAMA STREET APARTMENT V8, BELLINGHAM, WASHINGTON
18 Records Related to Target Location 5

19 70. According to Puget Sound Energy the customer of record for **Target**
20 **Location 5** is Amy HAMNER since April 2019.

21 71. According to a search of the Washington Department of Licensing, Amy
22 HAMNER has registered multiple vehicles at 2100 Alabama Street Apartment V8,
23 Bellingham, Washington 98229 (**Target Location 5**).

24 //

25 //

26

⁷ Due to positional accuracy errors of GPS and the rural isolated nature of **Target Location 4**, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 4** if it was within 400 feet of the residence.

1 Messages with 360-919-9666 (TT15)

2 72. According to T-Mobile records, 360-919-9666 (TT15) is subscribed to
 3 Kristi Calloway at 3425 Redwood Avenue, Bellingham, Washington 98225 with an
 4 activation date of July 15, 2021. According to a toll analysis, MARTINEZ LOPEZ
 5 (TT10) has been in contact with 360-919-9666 (TT15) approximately 539 times
 6 between June 2, 2022 and August 19, 2022. According to a law enforcement database,
 7 TT15 was associated to Amy HAMNER with an address of 2100 Alabama Street
 8 Apartment V8, Bellingham, Washington (**Target Location 5**).

9 73. As discussed below, during the court authorized search of Casey
 10 LANDIS's cell phone, LANDIS had 360-919-9666 (TT15) saved in his phone as "Amy
 11 Hammer." Investigators believe that "Hammer" is a misspelling of HAMNER.

12 74. On July 30, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
 13 (TT15) exchanged the following messages:

14	7/30/2022 15:57	Incoming	3609199666	"Just passed Angel of the winds"
15				"\0https://www.google.com/url?sa=i&source=web&rct=j&url=https://www.google.com/maps/place//da ta%3D!4m2!3m1!1s0x548555147adc9731:0x7a64928f7f3cd1b&ved=2ahUKE"
16	7/30/2022 16:43	Outgoing	3609199666	"\0https://www.google.com/url?sa=i&source=web&rct=j&url=https://www.google.com/maps/place//da ta%3D!4m2!3m1!1s0x548555147adc9731:0x7a64928f7f3cd1b&ved=2ahUKE"
17				"\0wjX3d2V5aH5AhUE8ucDHbSnAnIQ4kB6BAGAECl&cd&psig=AOvVaw2OYJ34blm9PvqwTINA64na&ust=1659310963609000"
18	7/30/2022 16:43	Outgoing	3609199666	"Hi fitness parking"
19	7/30/2022 16:43	Outgoing	3609199666	"Black lexus front passenger door "
20	7/30/2022 16:43	Outgoing	3609199666	"Leave money and card in the middle "
21	7/30/2022 16:59	Incoming	3609199666	"You locked the door"
22	7/30/2022 17:00	Incoming	3609199666	"My oh my. We r getting gas next door"
23	7/30/2022 17:03	Incoming	3609199666	"Ok we will be right back"
24	7/30/2022 17:07	Incoming	3609199666	"It's not unlocked"

25 75. Based on training and experience I believe that MARTINEZ LOPEZ is
 26 directing the user of 360-919-9666 (TT15) to some money and a card, possibly a
 27
 28

1 payment for a drug debit, in MARTINEZ LOPEZ's vehicle, which he describes as a
 2 black Lexus, likely MARTINEZ LOPEZ's black Lexus (**TV5**).
 3

4 76. On August 1, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
 5 (TT15) exchanged the following messages:
 6

7	8/1/2022 11:39	Incoming	3609199666	"Waiting..... On you!! Anyway I just got on freeway and I'm halling ass."
8	8/1/2022 11:50	Outgoing	3609199666	"Ok "
9	8/1/2022 11:50	Outgoing	3609199666	"I'm almost done at the dentist "
10	8/1/2022 11:54	Incoming	3609199666	"Ok"
11	8/1/2022 11:54	Incoming	3609199666	"Lmk"
12	8/1/2022 12:03	Outgoing	3609199666	"50+180+250+500"
13	8/1/2022 12:04	Incoming	3609199666	"Hi, call me please "
14	8/1/2022 12:06	Incoming	3609199666	"I got 8 I'd that ok"
15	8/1/2022 12:07	Incoming	3609199666	"I owe 230 then?"
16	8/1/2022 12:07	Incoming	3609199666	" Gosh I got those little things for a dollar each the other day I couldn't believe it I hope you're getting ready to give me a better deal"
17	8/1/2022 12:11	Outgoing	3609199666	"Lol whatttttttt"
18	8/1/2022 12:12	Outgoing	3609199666	"I need to meet your plug lol"
19	8/1/2022 12:15	Incoming	3609199666	"You already did lol"
20	8/1/2022 13:15	Incoming	3609199666	"I'm here"

21 77. Based on my training and experience "50+180+250+500" is reference to
 22 the prices for various drugs that were ordered, "I got 8 I'd that ok" is reference to \$800
 23 and "I owe 230 then?" is reference to MARTINEZ LOPEZ fronting \$230 worth of
 24 drugs to the user of 360-919-9666 (TT15). Additionally, in the contents of this
 25 conversation, I believe that "those little things" is reference to "M30" fentanyl pills and
 26 that "dollar each" is a reference to paying \$1 per "M30" fentanyl pill. Finally, I believe
 27 that "Lol whatttttttt" and "I need to meet your plug lol" is MARTINEZ LOPEZ imply
 28 that \$1 per "M30" fentanyl pill was a good price and that MARTINEZ LOPEZ want to
 meet the user of 360-919-9666 (TT15)'s source of supply.

29 78. On August 12, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
 30 (TT15) exchanged the following messages:
 31

32	8/12/2022 22:16	Incoming	3609199666	"How long till you get more girl"
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1	8/12/2022 22:19	Outgoing	3609199666	"I have more it's just in smokey point I only bought 7zips on me"
2	8/12/2022 23:39	Incoming	3609199666	"Aww ok"
3	8/12/2022 23:56	Outgoing	3609199666	"Yup u good tho"

4 79. Based on my training and experience I know that “girl” is commonly used
 5 code for cocaine and that “zips” is commonly used code of ounces of drugs. In this
 6 conversation, I believe that user of 360-919-9666 (TT15) is asking MARTINEZ
 7 LOPEZ for cocaine and MARTINEZ LOPEZ says that he only has seven ounce of
 8 cocaine with him but has more cocaine at a location in Smokey Point.

9 Use of Cell Site Simulator to Location TT15

10 80. On September 28, 2022, investigators, pursuant to court authorization,
 11 utilized a cell site simulator to locate TT15. The cell site simulator indicated that TT15
 12 was likely located within a residence on the west side of the apartment complex at 2100
 13 Alabama Street, in either apartment “V7 or “V8.”

14 Identification of (360-224-7106) Target Telephone 15a

15 81. According to T-Mobile records, service ended on September 30, 2022 for
 16 360-919-9666 (TT15). During a toll analysis, investigators identified 360-224-7106
 17 (TT15a) as a new phone number in contact with MARTINEZ LOPEZ’s TT10.

18 82. According to T-Mobile records, 360-224-7106 (TT15a) is subscribed to
 19 Kristi Calloway at 3425 Redwood Avenue, Bellingham Washington 98225 with an
 20 activation date of September 30, 2022. As described above, this is the same subscriber
 21 information that was listed for 360-919-9666 (TT15). According to a toll analysis,
 22 MARTINEZ LOPEZ (TT10) has been in contact with 360-224-7106 (TT15a)
 23 approximately 57 times between September 30, 2022 and October 19, 2022.

24 83. Between September 30, 2022 and October 4, 2022 360-224-7106 (TT15a)
 25 contacted 72 different phone numbers. Investigators conducted a common call analysis
 26 of 360-919-9666 (TT15) and 360-224-7106 (TT15a), between September 30, 2022 and
 27 October 4, 2022, TT15a contacted 58 numbers that were also contacted by TT15. This
 28 equates to approximately 80% of the phone numbers called by TT15a were also

1 previously called by TT15. As such, investigators believe that TT15a is used by the
 2 same person as TT15 and investigators believe that individual is likely Amy HAMNER.
 3

Surveillance of Enoc MARTINEZ LOPEZ on September 28, 2022

4 84. On September 28, 2022, investigators conducted surveillance at
 5 HAMNER's suspected residence, 2100 Alabama Street Apartment V8, Bellingham,
 6 Washington (**Target Location 5**). Investigators observed MARTINEZ LOPEZ's black
 7 Lexus (WA/BSU8484) (**TV5**) park near HAMNER's residence, MARTINEZ LOPEZ
 8 get out of the **TV5** and walk into a gate marked V8. Approximately 20 minutes later,
 9 investigators observed MARTINEZ LOPEZ walk out of the same gate, return to **TV5**
 10 and depart.

October 18, 2022 Stop of Darin and Amber COOPER

11 85. On October 18, 2022, investigators conducted surveillance at **Target**
 12 **Location 5**. Investigators observed a Nissan Sentra with no rear license plate park near
 13 2100 Alabama Street, Bellingham, Washington. Investigators then observed a male,
 14 later identified as Darin COOPER, get out of the Nissan Sentra, walk into the gate/door
 15 labeled "V8," remain inside for approximately one minute before walking out and back
 16 to the Nissan Sentra. Investigators then observed the Nissan Sentra drive away. Based
 17 on my training and experience I know that short stay traffic, such as that described
 18 above, is consistent with drug trafficking.

20 86. Investigators followed the Nissan Sentra until the vehicle was stopped by
 21 a uniformed deputy in a marked patrol car. Deputies identified the driver as Amber
 22 Cooper and the passenger as Darin COOPER. Deputies told Amber Cooper and Darin
 23 COOPER that they were being detained and not free to leave. While attempting to
 24 detain Darin COOPER, Darin COOPER actively resisted and fought with deputies.
 25 Deputies subsequently detained Darin COOPER and placed him under arrest for
 26 obstructing. During a search incident to arrest of Darin COOPER's person, deputies
 27 located a small bag of suspected methamphetamine. Amber Cooper told deputies that
 28 she was aware of Darin COOPER's drug use and that she did not know what Darin

1 COOPER did after she dropped him off but would not be surprised if Darin COOPER
 2 had just gone to purchase drugs. Darin COOPER was cited and released and Amber
 3 Cooper was release from the scene.

4 87. Based on the observations described above, investigators believe that
 5 Darin COOPER obtained the methamphetamine from an individual located at **Target**
 6 **Location 5.**

7 Stop of Patrick Arnold, Jason ERSKIN and Christina Hawley in November 2022

8 88. On November 9, 2022, investigators conducted surveillance at **Target**
 9 **Location 5.** At approximately 7:22 PM, investigators observed Enoc MARTINEZ
 10 LOPEZ's white Mercedes (WA/CEX6393) (**TV9**), park near 2100 Alabama Street,
 11 Bellingham, Washington and MARTINEZ LOPEZ walk into the gate/door marked
 12 "V8" (**Target Location 5**). At approximately 7:33 PM, investigators observed
 13 MARTINEZ LOPEZ walk out of the gate/door marked "V8", walk to the Mercedes
 14 (**TV9**) and drive away.

15 89. Investigators continued to conduct surveillance at **Target Location 5** and
 16 at approximately 9:34 PM, investigators observed a female walk into the door/gate
 17 marked "V8" (**Target Location 5**). At approximately 9:40 PM, investigators observed
 18 the same female walk out of the gate/door marked "V8" and get into a white Ford F250
 19 (AZ/8XA1A1A) and drive away. A records check indicated that AZ/8XA1A1A is a
 20 2002 Ford F250 registered to Patrick Arnold at 23754 West Hidalgo Avenue, Buckeye,
 21 Arizona.

22 90. Investigators followed the Ford F250 until deputies stopped the vehicle.
 23 Deputies identified the driver as Patrick Arnold and the passengers as Jason ERSKIN
 24 and Christina HAWLEY. Arnold consented to a search of the vehicle and nothing was
 25 found. ERSKIN consented to a search of his pockets. Deputies located a small
 26 quantity of suspected methamphetamine. ERSKIN then told deputies that he had about
 27 an ounce in his other pocket which deputies recovered. ERSKIN then told deputies that
 28 he paid \$180 for the methamphetamine and had bought it a few days ago at the casino.

1 HAWLEY told deputies that she went to “Amy’s house” and that she bought
 2 methamphetamine for ERSKIN from “Amy” for ERSKIN. ERSKIN confirmed that
 3 HAWLEY’s statements were true. As discussed above, investigators believe that Amy
 4 HAMNER lives at **Target Location 5** and that the “Amy” referenced by HAWLEY
 5 was HAMNER. The methamphetamine seized from ERSKIN weighed 28.1 gross
 6 grams and field tested positive for methamphetamine. Arnold, HAWLEY and ERSKIN
 7 were released.

8 Location Information for MARTINEZ LOPEZ’s Vehicles

9 91. Court authorized location information for MARTINEZ LOPEZ’s various
 10 vehicles indicates that MARTINEZ LOPEZ’s vehicles went to **Target Location 5**⁸
 11 approximately 16 times, specifically on July 14, 2022 August 19, 22, 24, and 25, 2022,
 12 September 3, 6, 7, 15, 16, 17, 18, 23, and 25 2022 and October 2 and 31, 2022.

13 92. As discussed above, investigators physically observed MARTINEZ
 14 LOPEZ at **Target Location 5** on September 28, 2022, which is not a date the tracking
 15 information indicated that MARTINEZ LOPEZ was there. The vehicle that
 16 MARTINEZ LOPEZ was driving on September 28, 2022, was not being tracked at that
 17 time. This illustrates that the tracking information for MARTINEZ LOPEZ’s vehicles
 18 does not provide a complete accounting of the instances that MARTINEZ LOPEZ visit
 19 a location, the tracking information is an approximation of the number of visits made by
 20 MARTINEZ LOPEZ.

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28 ⁸ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ’s vehicle at **Target Location 5** if it was within 150 feet of the residence.

TARGET LOCATION 6:

1511 WILLOWBROOK PLACE, BELLINGHAM, WASHINGTON

Records Related to Target Location 6

93. According to the Whatcom County Assessor's website, 1511 Willowbrook Place, Bellingham, Washington (**Target Location 6**) is owned by Merritt S Washburn. As discussed below, Merritt Washburn is the subscriber for 360-927-5454, the phone believed to be used by Eric WASHBURN.

94. According to Puget Sound Energy, the customer of record for **Target Location 6** is Merritt Washburn, since September 2002.

Messages with 360-927-5454 (TT20)

95. According to Verizon Wireless records, 360-927-5454 (TT20) is registered to Merritt Washburn at 1511 Willowbrook Place, Bellingham, Washington 98229, with a contact name of Erica WASHBURN with activation date of March 21, 2017. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact with 360-927-5454 (TT20) approximately 1563 times between May 17, 2022, and October 14, 2022.

96. On June 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

6/30/2022 8:30	Incoming	3609275454	"Can you give me any dirt I know you don't typically get it but it's an emergency.g Hyundai"
6/30/2022 11:39	Outgoing	3609275454	"Dirt?"
6/30/2022 11:39	Outgoing	3609275454	"Ohh I don't have any"
6/30/2022 11:39	Outgoing	3609275454	"I'm all out"
6/30/2022 12:46	Incoming	3609275454	",I know but can you get any dark? I need it to go on vacation "
6/30/2022 12:48	Incoming	3609275454	"Dark tanning lotion that is \n\nI my phone always writes dirt" instead of dark and "house" instead of ha If """"
6/30/2022 12:49	Incoming	3609275454	"Are you out of the baby powder or dark tanning lotion"
6/30/2022 14:36	Incoming	3609275454	"I'm confused are you out of white or dark?"
6/30/2022 14:43	Outgoing	3609275454	"Dark "
6/30/2022 14:43	Outgoing	3609275454	"Yes none left"

1	6/30/2022 15:19	Incoming	3609275454	"I actually need twice as much "
2				"I'm Going into Safeway to get a phone charger in a few minutes. Then to the North Coast credit Union to get money out of the ATM. My phone is about to die"
3	6/30/2022 15:38	Incoming	3609275454	"Where do you want me to go"
4	6/30/2022 15:45	Incoming	3609275454	"Ok I'm just chilling at safe way "
5	6/30/2022 15:52	Incoming	3609275454	"I gotta get on a flight- any idea how long ?"
6	6/30/2022 16:17	Incoming	3609275454	"Can we. X"

7 97. Based on training and experience I know that "white" is commonly used
 8 code for cocaine and in this investigation may be used as code for white fentanyl
 9 powder and that "dark" is commonly used code for heroin. In this conversation, I
 10 believe that the user of 360-927-5454 (TT19), likely Erica WASHBURN, as discussed
 11 below, asked MARTINEZ LOPEZ if MARTINEZ LOPEZ could obtain heroin for
 12 WASHBURN. As discussed below, WASHBURN appears to typically obtain half an
 13 ounce of a fentanyl powder from MARTINEZ LOPEZ. As such, investigators believe
 14 that this conversation concludes with WASHBURN attempting to meet MARTINEZ
 15 LOPEZ to obtain double her typical amount, or a total of one ounce of fentanyl powder.

16 98. On July 29 and 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-
 17 927-5454 (TT20) exchanged the following messages:

18	7/29/2022 12:36	Outgoing	3609275454	"145 Cascade Pl #105, Burlington, WA 98233"
19	7/29/2022 12:37	Incoming	3609275454	"Ok"
20	7/29/2022 12:55	Incoming	3609275454	"340 Erica o"
21				"\07Ok I have your \$340!\n\nI also have melting 22 popsicles and ice cream in my car I need to get home. \n\nIf it's ok with you., can I send tomorrow?\n\nOf course"
23	7/29/2022 20:52	Incoming	3609275454	"\07 if y need it today, I can come come bsck out to 24 the bank later to deposit "
25	7/29/2022 21:25	Outgoing	3609275454	"Ok I'm in bham rn "
26	7/29/2022 22:57	Incoming	3609275454	"Ok come over soon "
27	7/29/2022 22:57	Incoming	3609275454	"I mean at your liesure lol"
28	7/29/2022 22:58	Outgoing	3609275454	"Ok u just gonna be home"
	7/29/2022 22:59	Incoming	3609275454	"Yep I can meet u somewhere too if you want "
	7/29/2022 22:59	Incoming	3609275454	"Kids are gone for the weekend"

1	7/29/2022 23:00	Outgoing	3609275454	"Yay!!!! Lol"
2	7/29/2022 23:00	Incoming	3609275454	"Ikr!! This never happens"
3	7/30/2022 0:10	Incoming	3609275454	"You coming?"
4	7/30/2022 0:13	Outgoing	3609275454	"In 20 min"
5	7/30/2022 0:13	Outgoing	3609275454	"Leaving custet now"
	7/30/2022 0:27	Incoming	3609275454	"My\nl\nHi"
	7/30/2022 0:30	Outgoing	3609275454	"Here"

6 99. Based on training and experience I believe the messages on these days
 7 starts with a meeting location. I believe that the message "340 Erica o" is reference to
 8 Erica, possible Erica WASHBURN, the listed user of 360-927-5454 (TT20), owes
 9 MARTINEZ LOPEZ \$340. The messages also appear to indicate that WASHBURN
 10 meets with MARTINEZ LOPEZ to pay her debt

11 100. Later on July 30, 2022, MARTINEZ LOPEZ (TT10) and the user of 360-
 12 927-5454 (TT20) exchanged the following messages:

13	7/30/2022 18:57	Incoming	3609275454	"On my way"
14	7/30/2022 19:04	Outgoing	3609275454	"Ok"
15	7/30/2022 20:11	Incoming	3609275454	"\0/ I'm still on my way"
16				"\0/There's a HUGE pile up traffic jam at college way on the freeway going southbound. I am going to try to take some back roads south. Just letting you know"
17	7/30/2022 20:11	Incoming	3609275454	"\0/There's a HUGE pile up traffic jam at college way on the freeway going southbound. I am going to try to take some back roads south. Just letting you know"
18				"\0/ I'm still on my way"
19	7/30/2022 20:11	Incoming	3609275454	"\01Here's from last night (I only owed u \$340 though lol)\n\n(my husband likes to make sure I'm above and beyond paid off I guess LOL)\n\nHe just now sent you "
20				"\01\$250for 1q , AND I have 250 for the other Q. \n\n(So \$500 total for your last half is that correct?)"
21	7/30/2022 21:00	Incoming	3609275454	
22				
23	7/30/2022 21:00	Incoming	3609275454	
24				
25	7/30/2022 21:00	Incoming	3609275454	
26				
27				
28				

101. Based on training and experience, I believe that "q" is code of a quarter
 ounce and based on these messages that WASHBURN obtained a half an ounce of
 fentanyl powder for \$500.

1 102. On July 31, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-
 2 5454 (TT20) exchanged the following messages:

3	7/31/2022 15:34	Incoming	3609275454	"This shit is way too strong. Like I literally can split .1 4 (YES!! POINT ONE) into 3 shots and still get "
5	7/31/2022 15:34	Incoming	3609275454	"To falling over "

6 103. Based on training and experience I believe that .1 is reference to .1 grams
 7 and using 0.033 grams and the effect of "to falling over" is consistent with using
 fentanyl powder.

8 104. On August 2, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-
 9 5454 (TT20) exchanged the following message:

10	8/2/2022 0:57	Incoming	3609275454	"Hey I just sent you \$420 from my secret cash app 11 (\$husbandofwife) \n\n\nI have the other \$80 in my 12 pocket. ."
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13 105. Based on this investigation to date, investigators believe that MARTINEZ
 14 LOPEZ uses CashApp to transfer or receive drug proceeds and this messages appears to
 15 corroborate that information. Investigators believe that in this message WASHBURN
 16 said that she used CashApp to transfer \$420 to MARTINEZ LOPEZ to pay for drugs.

17 106. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-
 18 5454 (TT20) exchanged the following messages:

19	8/12/2022 19:52	Incoming	3609275454	"Yah can u come here?"
20	8/12/2022 19:55	Outgoing	3609275454	"Yes send me address"
21	8/12/2022 19:55	Outgoing	3609275454	"Pls"
22	8/12/2022 20:01	Incoming	3609275454	"1511 Willowbrook place 98229"

23 107. In these messages WASHBURN provided "1511 Willowbrook Place
 24 98229" (**Target Location 6**) as her address, which is the same address listed in the
 subscriber address for TT20.

25 October 3, 2022 Surveillance of MARTINEZ LOPEZ

26 108. On October 3, 2022, investigators observed that the location data for
 27 MARTINEZ LOPEZ's white BMW (TV4) was in the Bellingham, Washington area.
 28 Surveillance was established near WASHBURN's residence at 1511 Willowbrook

1 Place, Bellingham, Washington. Investigators observed MARTINEZ LOPEZ's white
 2 BMW (**TV4**) drive toward and down the driveway of WASHBURN's residence.
 3 MARTINEZ LOPEZ's BMW (**TV4**) remained in the driveway for a short amount of
 4 time before investigators observed it back out of the driveway and drive away.

5 109. Based on the messages described above, investigators believe that on
 6 October 3, 2022, MARTINEZ LOPEZ went to WASHBURN's residence for the
 7 purposes of providing WASHBURN drugs.

8 November 1, 2022 Surveillance of MARTINEZ LOPEZ

9 110. On November 1, 2022, investigators conducted surveillance of
 10 MARTINEZ LOPEZ as he drove his White BMW (**TV4**). At approximately 9:47 PM,
 11 investigators observed the White BMW (**TV4**) park in a business parking lot in
 12 Marysville, Washington next to a Chrysler 300 (CA/8YAZ310). Investigators were
 13 then able to observe a male get out of the white BMW, get into the Chrysler 300 and
 14 both vehicles depart. According to the California Department of Motor Vehicles, the
 15 Chrysler 300 is registered to EAN Holdings LLC (Enterprise, Alamo and National
 16 rental cars). According to EAN Holdings records and this vehicle was rented by Merritt
 17 Washburn at 1511 Willowbrook Place, Bellingham, Washington (**Target Location 6**).

18 November 2, 2022 Surveillance of MARTINEZ LOPEZ

19 111. On November 2, 2022, investigators conducted surveillance at **Target**
 20 **Location 6**. At approximately 10:35 PM, investigators observed MARTINEZ
 21 LOPEZ's **TV1** park in the area of **Target Location 6**. At approximately 10:39 PM,
 22 investigators observed MARTINEZ LOPEZ's **TV1** leave **Target Location 6**.
 23 Investigators also observed the same Chrysler 300 (CA/8YAZ310), described above,
 24 parked in the driveway of **Target Location 6**. Based on training and experience I
 25 know that short stay traffic as that described above is consistent with drug trafficking.
 26 Based on the observations of investigators and the messages described above,
 27 investigators believe that MARTINEZ LOEPZ went to **Target Location 6** to deliver
 28 drugs to WASHBURN.

Location Information for MARTINEZ LOPEZ's Vehicles

112. Court authorized location information for MARTINEZ LOPEZ's various vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 6⁹** approximately 4 times, specifically on August 12, 2022 and October 3 and 8, 2022 and November 2, 2022.

113. Additionally, as is illustrated by the November 1, 2022 meeting and the messages described above, investigators believe that WASHBURN meets with MARTINEZ LOPEZ at locations other than **Target Location 6**.

TARGET LOCATION 7:

4076 JONES LANE, BELLINGHAM, WASHINGTON

Records Related to Target Location 7

114. According to the Whatcom County Assessor's website, 4076 Jones Lane, Bellingham, Washington is owned by Northwest General Builders Constructions LLC with a mail address of PO Box 2735, Ferndale, Washington.

115. According to a search on the Washington Department of Revenue website, N/W General Builders Construction LLC lists a legal name of Aurus Construction LLC and a sole governing individual as Grigoriy N YUDIN with a location and mail address of 3886 Aldergrove Road, Ferndale, Washington.

116. According to Puget Sound Energy records the customer of record for **Target Location 7** is Aru us Construction and the listed alternate contact is Grigory YUDIN and Natalya Yudin since October 2022. Investigators believe that “Aru us” Construction is a misspelling of YUDIN’s “Aurus” Construction and “Grigory” is a misspelling of “Grigoriy” YUDIN. As discussed above, YUDIN is the owner of Aurus Construction.

⁹ Due to positional accuracy errors of GPS, rural location and proximity to other known associated address, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 7** if it was within 300 feet of the residence.

1 Messages with 360-325-5738 (TT24)

2 117. According to Verizon Wireless records, no subscriber information is
 3 provided for 360-325-5738 (TT24); however, an activation date for January 27, 2021,
 4 was listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in
 5 contact with 360-325-5738 (TT24) approximately 1076 times between May 16, 2022,
 6 and October 17, 2022. Investigators suspected that TT24 is being used by Grigoriy
 7 YUDIN.

8 118. In late July/early August 2022, MARTINEZ LOPEZ (TT10) and the user
 9 of 360-325-5738 (TT24) exchanged the following messages:

10	7/30/2022 1:44	Incoming	3603255738	"\0Hey bro what's with this white paint, it's different from your normal staff, do you still have your normal staff or can you get it, cause my pps didn't r"
11	7/30/2022 1:44	Incoming	3603255738	"\0eally liked this new one? "
12	7/30/2022 2:01	Outgoing	3603255738	"I havnt had no issue"
13	7/30/2022 2:07	Incoming	3603255738	"Snore it"
14	7/30/2022 2:08	Outgoing	3603255738	"Really "
15	7/30/2022 2:08	Outgoing	3603255738	"What they say"
16	8/1/2022 23:32	Incoming	3603255738	"What up bro, you coming today or tomorrow?"
17	8/2/2022 0:01	Outgoing	3603255738	"Tomorrow I am"
18	8/2/2022 0:01	Outgoing	3603255738	"Yea bro idk what happend on the white"
19	8/2/2022 0:24	Incoming	3603255738	"Oh yea mine take it as is and do they noticed it the difference. You don't have your usual?"
20	8/2/2022 0:28	Incoming	3603255738	"\0If you don't have your usual just bring the same for the amount that was shot. I got your \$100 too. \nOh and if you can remember to bring dark paint one b"
21	8/2/2022 0:28	Incoming	3603255738	"\0ucket tomorrow cause I'm out and of force the little once"
22	8/2/2022 0:28	Incoming	3603255738	"\0ucket tomorrow cause I'm out and of force the little once"
23	8/2/2022 2:00	Incoming	3603255738	"K. What time you thinking?"
24	8/2/2022 2:01	Outgoing	3603255738	"Like 6pm ima leave smokey point "
25	8/2/2022 2:02	Incoming	3603255738	"Lmk before you head this way so I have time to get it ready k"
26	8/2/2022 2:21	Outgoing	3603255738	"Ok"
27	8/2/2022 20:04	Outgoing	3603255738	"On my way"
28	8/2/2022 21:23	Incoming	3603255738	"Yo where you at bro?"

1	8/2/2022 21:47	Incoming	3603255738	"You already here, cause I didn't see your first massage right away? "
2	8/2/2022 22:37	Outgoing	3603255738	"6 min"
3	8/2/2022 22:38	Incoming	3603255738	"Okay"
4	8/2/2022 22:43	Outgoing	3603255738	"Cone out"
	8/2/2022 22:43	Incoming	3603255738	"K. Give me couple min"

5 119. Based on the investigation to date, MARTINEZ LOPEZ is not known to
 6 be a paint salesman. Based on training and experience I believe that "white paint" is
 7 code for cocaine or white fentanyl powder, discussed in other conversations and that
 8 "dark paint" is code for heroin. In this conversation investigators believe that the user
 9 of 360-325-5738 (TT24) is requesting to obtain heroin and possibly cocaine or white
 10 powder fentanyl from MARTINEZ LOPEZ and MARTINEZ LOPEZ agreed to meet
 11 them.

12 120. On August 9 and 10, 2022, MARTINEZ LOPEZ (TT10) and the user of
 13 360-325-5738 (TT24) exchanged the following messages:

14	8/9/2022 23:31	Incoming	3603255738	"What up bro. You coming tomorrow. I need white paint and I got that cash for ya? "
15	8/9/2022 23:31	Outgoing	3603255738	"Yes I am "
16	8/9/2022 23:33	Incoming	3603255738	"K. Lmk b4 heading this way and bring half a bucket of interior white paint. "
17	8/10/2022 20:34	Outgoing	3603255738	"Yo I'm here"

18 121. Investigators believe that "bucket" is code for a quantity of drugs,
 19 possibly a pound or kilogram quantity. In these messages that investigators believe that
 20 the user of 360-325-5738 (TT24) is requested possibly half a pound or kilogram of
 21 cocaine or white fentanyl powder.

Use of Cell Site Simulator to locate TT24

23 122. On September 28, 2022, investigators, pursuant to court authorization,
 24 utilized a cell site simulator to locate TT24. The cell site simulator indicated that TT24
 25 was likely in possession of a white adult male in the area of a food truck in Bellingham.
 26 Investigators observed this white male walk to a Chevy Silverado (WA/B99947W).
 27 According to the Washington Department of Licensing, WA/B99947W is a silver 2009

1 Chevy Silverado registered to Grigoriy YUDIN DBA Reliable Auto at 3886 Aldergrove
 2 Road, Ferndale, Washington. Investigators positively identified YUDIN as the white
 3 adult male and driver of the Chevy Silverado.

4 November 3, 2022 Surveillance of YUDIN

5 123. On November 3, 2022, investigators conducted surveillance of YUDIN.
 6 Investigators established surveillance at YUDIN's residence (**Target Location 7**) at
 7 approximately 4:30 PM, at which time, location information for TT24 indicated that it
 8 was near **Target Location 7**. At approximately 5:59 PM, investigators observed
 9 YUDIN leave Target Location 7 and drive to 3886 Aldergrove Road, Ferndale,
 10 Washington. At approximately 10:58 PM, investigators observed YUDIN's vehicle
 11 depart the Aldergrove Road address and drive to **Target Location 7**. The location data
 12 for TT24 approximately followed the physical observations of YUDIN's location, with
 13 TT24 departing **Target Location 7** at approximately the same time as YUDIN, arriving
 14 and departing the Aldergrove residence at approximately the same time as YUDIN did
 15 and arriving at **Target Location 7** at the same time as YUDIN. Based on the cell site
 16 simulator and physical observations of investigators, investigators believe that YUDIN
 17 is the user of TT24.

18 Location & Pole Camera Information for MARTINEZ LOPEZ's Vehicles

19 124. Court authorized location information for MARTINEZ LOPEZ's various
 20 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 7**
 21 approximately 11 times, specifically on August 21 and 25, 2022, September 7, 17, and
 22 23, 2022, October 10, 24 and 28, 2022, and November 2, 6 and 11, 2022.

23 125. Additionally, investigators have a pole camera installed at **Target**
 24 **Location 7**. After conducting a limited review of the pole camera records, investigators
 25 observed MARTINEZ LOPEZ's vehicles at **Target Location 7** on the following days
 26 September 7, 10, and 24, 2022, October 10, 18, 24 and 31, 2022 and on November 2,

27
28

1 2022.¹⁰ It should be noted that several of the dates match up to vehicle tracking
 2 information and other dates are not listed. As discussed above, investigators did not
 3 have tracking devices installed on all of MARTINEZ LOPEZ's vehicles during this
 4 entire investigation.

5

6 **TARGET LOCATION 8:**

7 **2100 HALLECK STREET, BELLINGHAM, WASHINGTON**

8 Records Related to Target Location 8

9 126. **Target Location 8**, sits at the intersection of I Street and Halleck Street
 10 in Bellingham, Washington. According to Puget Sound Energy, the address 2100
 11 Halleck Street, Bellingham, Washington does not exist in their records. However, 2100
 12 I Street, Bellingham, Washington has electric service provided by Puget Sound. A
 13 search of Whatcom County Assessor's website for 2100 I Street, Bellingham,
 14 Washington, does not return any results. As discussed below, GUNDERSON provides
 15 2100 I Street to LANDIS as GUNDERSON's address. An Apple Maps search for 2100
 16 Halleck Street, Bellingham, Washington, gives a location approximately two block
 17 northwest of **Target Location 8**. However, an Apple Maps search for 2100 I Street,
 18 Bellingham, Washington, gives **Target Location 8**. A Google Maps search for 2100 I
 19 Street gives a location in the middle of the intersection of I Street and Halleck Street
 20 and a search for 2100 Halleck Street gives **Target Location 8**. Investigators believe
 21 that 2100 I Street and 2100 Halleck Street refer to the same location **Target Location**
 22 **8**, this affidavit will refer to **Target Location 8** by the Whatcom County Assessor's
 23 address of 2100 Halleck Street, Bellingham, Washington.

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¹⁰ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 7** if it was within 150 feet of the residence.

1 127. To avoid any confusion, in the sections below I discuss observations of
 2 individuals observed walking out of **Target Location 8**, which is depicted in the image
 3 below and listed as 2100 Halleck Street, Bellingham, Washington (**Target Location 8**).
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 5
 6
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10 128. According to the Puget Sound Energy the customer of record for 2100 I
 11 Street, Bellingham Washington is Hanna Erlandson since March 2022. As discussed
 12 above, investigators believe that 2100 I Street and 2100 Halleck Street (**Target**
 13 **Location 8**) are the same address.
 14

15 129. According to a search of the Whatcom County Assessor's website, 2100
 16 Halleck Street, Bellingham, Washington, is the correct address.

17 Messages with 360-739-0044 (TT30)

18 130. According to Verizon records, 360-812-5984 (TT30) is subscribed to
 19 Terri Gunderson at 5145 Eberly Place, Bellingham, Washington 98226 with an
 20 activation date of May 10, 2021. Additionally listed was a contact name of "Anthony
 21 Phone." According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact
 22 with 360-739-0044 (TT30) approximately 278 times between May 17, 2022, and
 23 October 19, 2022. Investigators know that Anthony GUNDERSON lived at 5145
 24 Eberly Place, Bellingham, Washington 98226.

25 131. As part of separate but related investigation, Yolanda ORTIGOZA
 26 REYES was arrested. Seized from her person at the time of her arrest was
 27 approximately 440 gross grams of suspected fentanyl powder, 450 gross grams of
 suspected fentanyl pills, and 110 grams of suspected heroin and 3 cell phones.
 28

1 ORTIGOZA REYES's phones were searched pursuant to a search warrant. In one of
 2 her phones, investigators recovered the following messages:

3	7/22/2022 18:02	Incoming	3607390044	"I want to buy some of the white ones"
4	7/22/2022 18:03	Outgoing	3607390044	"Okay"
5	7/22/2022 18:04	Outgoing	3607390044	"How"
6	7/22/2022 18:13	Outgoing	3607390044	"Send me your location"
7	7/22/2022 18:13	Outgoing	3607390044	"Please"
8	7/22/2022 18:42	Incoming	3607390044	"2100 I Street"
9	7/22/2022 18:44	Outgoing	3607390044	"Ok"
10	7/22/2022 19:23	Outgoing	3607390044	"I'm here"
11	7/22/2022 19:26	Outgoing	3607390044	"I'm here"
12	7/22/2022 19:27	Outgoing	3607390044	"How long"
13	7/24/2022 2:50	Incoming	3607390044	"One of the oz you gave me was dark"
14	7/24/2022 2:50	Incoming	3607390044	"Not chia"
15	7/24/2022 4:25	Outgoing	3607390044	"Omg"
16	7/24/2022 4:25	Outgoing	3607390044	"And so sorry"

132. Based on my training and experience, I believe that "Chia" is a
 14 misspelling of "China," which is commonly used code for fentanyl powder, or possibly
 15 white heroin, and "dark" is commonly used code for heroin. In these messages, I
 16 believe that GUNDERSON obtained a quantity of obtain fentanyl powder and mixed in
 17 with the fentanyl powder was an ounce of heroin instead of fentanyl powder.

133. On July 1, 2022, and August 12, 2022, MARINEZ LOPEZ (TT10) and
 14 GUNDERSON exchanged the following messages:

20	7/1/2022 10:36	Outgoing	3607390044	"Ay bro can you send the rest of the cash app"
21	8/12/2022 13:19	Outgoing	3607390044	"Let me know when u ready \$1.10"

21 134. Based on my training and experience, I know that "cash app" likely refers
 22 to CashApp, an online platform that can be used to send money between people and
 23 that \$1.10 is approximately the going wholesale rate for fentanyl pills.

24 November 2, 2022 Traffic Stop of Kurt HALL

25 135. On November 2, 2022, investigators conducted surveillance on **Target**
 26 **Location 8**. At approximately 8:13 PM, investigators observed an individual later
 27 identified as Kurt HALL, walk up to the front door of **Target Location 8** and
 28 eventually walk inside. At approximately 8:26 PM, investigators observed HALL walk

1 out of **Target Location 8** and walk across the street. A short time later, investigators
 2 observed a beige Ford Taurus (WA/BYD2076) driving away from the area. According
 3 to the Washington Department of Licensing, WA/BYD2076 is a beige 2002 Ford
 4 Taurus registered to Antoina Jo Bill at 2160 Washington Street Apartment 205,
 5 Ferndale, Washington. Based on training and experience I know that short stay traffic,
 6 such as that described above, is consistent with drug trafficking.

7 136. Investigators followed the vehicle for a short amount of time before
 8 uniformed deputies in a marked patrol car stopped the Ford Taurus. Deputies identified
 9 HALL as the driver of the vehicle. HALL was detained by deputies. Deputies read
 10 HALL his Miranda Rights. Deputies observed a large glass pipe in HALL's pocket,
 11 after it was removed, deputies observed that it had apparent drug residue inside it.
 12 HALL admitted to having "crack" in his pocket and allowed deputies to retrieve it from
 13 his pocket. Based on training and experience, "crack" is commonly used code for a
 14 form of cocaine. HALL was also found to have a digital scale in his possession. HALL
 15 consented a search of his vehicle and nothing of evidentiary value was found. HALL
 16 told deputies that he was at his friend's house and that he bought the pipe from his
 17 friend. Shortly thereafter HALL requested to speak to an attorney. After HALL
 18 requested to speak to an attorney, he kept rambling and speaking at deputies. HALL
 19 was released from the scene.

20 137. Based on the observations described above, investigators suspect that
 21 HALL obtained the pipe with drug residue and/or the crack cocaine from an individual
 22 at **Target Location 8**.

23 November 2, 2022 Stop of Corbin SAUNDERS; seizure of 4.7 gross grams of
 24 methamphetamine, 14.2 gross grams of methamphetamine, 24.9 gross grams of
cocaine, an AR15 style rifle and a handgun from his vehicle.

25 138. After the stop of Kurt HALL, discussed earlier in this affidavit,
 26 investigators continued surveillance on **Target Location 8**, a suspected location from
 27 which controlled substances were being sold by GUNDERSON, a known narcotics
 28 dealer. GUNDERSON's criminal history indicates he has a 2011 felony drug

1 trafficking conviction and a 2019 felony drug trafficking conviction. At approximately
 2 9:50 PM, investigators observed an individual, who appeared to be a male adult, walk
 3 out of **Target Location 8**, and toward a vehicle later identified as a Tesla. Investigators
 4 observed lights activated on the Tesla, and then observed the Tesla drive away and
 5 noted the license plate as WA/CEE7989. According to the Washington Department of
 6 Licensing, WA/CEE7989 is a blue 2018 Tesla Model 3 registered to Corbin
 7 SAUNDERS at 15512 Forty Five Road, Arlington, Washington. Investigators had been
 8 conducting hours of surveillance at **Target Location 8** and noted short stay traffic at
 9 this residence as described earlier in this affidavit. Based on training and experience I
 10 know that short stay traffic, such as that described above, is consistent with drug
 11 trafficking. Based on their training and experience, investigators believed that the
 12 person driving the Tesla was likely involved in a narcotics transaction with
 13 GUNDERSON and/or persons inside of **Target Location 8**.

14 139. Investigators followed the Tesla a short way before it was stopped, within
 15 Whatcom County, by uniformed deputies in a marked patrol car. Deputies identified
 16 the driver as Corbin SAUNDERS and the passenger as Justy DAVIDSON.
 17 SAUNDERS denied consent to search the vehicle. A narcotics detecting K9 alerted to
 18 the presence of the odor of narcotics emanating from the vehicle. Deputies seized the
 19 vehicle pending the application of a search warrant. SAUNDERS and DAVIDSON
 20 were read their Miranda rights. Neither SAUNDERS nor DAVIDSON provided any
 21 statements regarding the source of the drugs that would be later found in the vehicle,
 22 described below. SAUNDERS and DAVIDSON were released from the scene.
 23 According to NCIC, SAUNDERS has multiple prior felony convictions, which would
 24 make it illegal for him to possess a firearm.

25 140. On November 3, 2022, a Whatcom County Superior Court Commissioner
 26 authorized a search warrant of the Tesla Model 3. On the same day, deputies contacted
 27 SAUNDERS and sent him a photograph of the approved search warrant. SAUNDERS
 28 remotely unlocked the doors and trunk of the Tesla Model 3. During the search of the

1 vehicle deputies located 4.7 gross grams of suspected methamphetamine from the
 2 passenger door and a women's purse which contained 14.2 gross grams of suspected
 3 methamphetamine and 24.9 gross grams of suspected cocaine. Also located in the
 4 purse was multiple items of dominion and control for DAVIDSON. Located in the
 5 center console cup holder was a digital scale with suspected drug residue. Deputies
 6 located a purse in the backseat which contained 45.2 gross grams of suspected
 7 methamphetamine, 1.4 gross grams of suspected heroin and additional suspected
 8 controlled substances.

9 141. During a search of the trunk of the Tesla Model 3, deputies located an
 10 AR-15 style rifle (KE Arms, Model KP-15, serial number KM05791). No magazines
 11 were found in the trunk of the vehicle. Deputies were initially unable to unlock the
 12 glove box of the Tesla Model 3. Deputies contacted SAUNDERS again who eventually
 13 gave them the "pin" number to unlock the glove box. Inside the glove box deputies
 14 located two rifle magazine which contained ammunition compatible with the rifle found
 15 in the trunk and a 9mm handgun (Canik, Model TP9 Elite Combat, serial number
 16 BN05248) which was loaded with a round in the chamber and a magazine which
 17 contained four more rounds. Neither firearm was listed as stolen. Both SAUNDERS
 18 and DAVIDSON are convicted felons are cannot legally possess firearms.

19 142. Based on the observations and seizures discussed above, investigators
 20 believe that SAUNDERS and/or DAVIDSON obtained some quantity of drugs from an
 21 occupant of **Target Location 8**.

22 Location Information for MARTINEZ LOPEZ's Vehicles

23 143. Court authorized location information for MARTINEZ LOPEZ's various
 24 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 8**¹¹

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 28 ¹¹ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's
 vehicle at **Target Location 8** if it was within 150 feet of the residence.

1 approximately 5 times, specifically on September 18 and 25, 2022, October 14 and 29,
 2 2022, and November 1, 2022.

3

4 **TARGET LOCATION 9:**

5 **1512 IRON STREET, BELLINGHAM, WASHINGTON**

6 Records Related to Target Location 9

7 144. According to the Puget Sound Energy the customer of record for Target
 8 Location 9 is Rick Alcantra since July 2022.

9 Messages between MARTINEZ LOPEZ and CASEY LANDIS (TT23)

10 145. According to Verizon Wireless records, no subscriber information is
 11 provided for 360-303-3643 (TT23); however, an activation date for April 6, 2021, was
 12 listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in contact
 13 with 360-303-3643 (TT23) approximately 540 times between June 10, 2022, and
 14 October 10, 2022.

15 146. According to a search of a law enforcement database, 360-303-3643
 16 (TT23) is used by Casey LANDIS. Investigators suspect that this phone is used by
 17 Casey LANDIS.

18 147. On August 2, 2022, MARTINEZ LOPEZ (TT10) and 360-303-3643
 19 (TT23) exchanged the following messages:

20	8/2/2022 18:43	Incoming	3603033643	"Hey bud, just checking in with you. \nAre you planning on coming to B'ham today/tonight by any chance?"
21	8/2/2022 18:54	Outgoing	3603033643	"Yea I am what u need "
22	8/2/2022 18:56	Incoming	3603033643	"Perfect, I'll be at my place. You can swing by whenever you want. \nl'm needing 2 boats. "
23	8/2/2022 20:39	Outgoing	3603033643	"U home there in 10 min"
24	8/2/2022 20:43	Incoming	3603033643	"Ten min. \nOk"
25	8/2/2022 20:43	Outgoing	3603033643	"Cool"
26	8/2/2022 20:54	Outgoing	3603033643	"Here"
27	8/2/2022 20:55	Incoming	3603033643	"I'm on the porch. \nCome on up"

1 148. Based on my training and experience, I know that the term "boat" is
 2 common code for a quantity of pills. Specifically, in this investigation, "boat" is
 3 common code for 1000 pills or tablets, likely "M30" fentanyl pills. Based on these
 4 messages, investigators believe that MARTINEZ LOPEZ met the user of 360-303-3643
 5 (TT23) at their residence in Bellingham Washington to distribute 2000 "M30" fentanyl
 6 pills.

7 149. On August 10, 2022, MARTINEZ LOPEZ and 360-303-3643 (TT23)
 8 exchanged the following messages:

9	8/10/2022 14:23	Incoming	3603033643	"Hey bud, are you coming to B'ham today?"
10	8/10/2022 14:25	Outgoing	3603033643	" Yes I am like 5pm I should be there"
11	8/10/2022 14:36	Incoming	3603033643	"Cool, cool!\nI am looking for two boats, and one coke. "
12	8/10/2022 14:47	Outgoing	3603033643	"Ok"
13	8/10/2022 17:59	Outgoing	3603033643	"On my way "
14	8/10/2022 18:04	Incoming	3603033643	"How long till you're here?\nI want to clear out the house "
15	8/10/2022 18:08	Outgoing	3603033643	"40 min"
16	8/10/2022 18:08	Outgoing	3603033643	"40 to an hour"
17	8/10/2022 18:54	Outgoing	3603033643	"What up bro I'm in bham "
18	8/10/2022 19:13	Incoming	3603033643	"Hey...wanna come over "
19	8/10/2022 19:19	Outgoing	3603033643	"Yes let me fining lummi first cane here wasn't sure if u were ready "
20	8/10/2022 19:21	Incoming	3603033643	"Would the silver reef casino be a better place to meet?"
21	8/10/2022 19:23	Outgoing	3603033643	"U coming here"
22	8/10/2022 19:23	Outgoing	3603033643	"???"
23	8/10/2022 19:24	Incoming	3603033643	"I was waiting for you at my house, then was going to go to the casino. \nSo we could either meet there in 30min. Or we could meet at my place "
24	8/10/2022 19:27	Outgoing	3603033643	"Come to casino then "
25	8/10/2022 19:28	Incoming	3603033643	"Ok"
26	8/10/2022 20:19	Outgoing	3603033643	"U at. the casino"
27	8/10/2022 20:19	Outgoing	3603033643	"I'm 2 min away"
28	8/10/2022 20:21	Incoming	3603033643	"Fuck bro, my ride is just picking me up. They were late. (Fuckin girls)\nSo just come here if you don't mind"
	8/10/2022 20:21	Outgoing	3603033643	"Yup I'm going "
	8/10/2022 20:22	Outgoing	3603033643	"No problem on my way"

1	8/10/2022 20:23	Incoming	3603033643	"Thanks homie. I'm here at the house ready for ya"
2	8/10/2022 20:29	Outgoing	3603033643	"Ok"
3	8/10/2022 20:40	Outgoing	3603033643	"Getting off exit"
4	8/10/2022 20:41	Incoming	3603033643	"Kk"
	8/10/2022 20:44	Outgoing	3603033643	"Here"

150. Based on training and experience, I know that "coke" is commonly used
 terminology for cocaine and, as previously stated above, "boat" is common code for
 1000 "M30" fentanyl pills. Based on these messages investigators believe that
 MARTINEZ LOPEZ met the user of 360-303-3643 (TT23) to provide them with 2000
 "M30" fentanyl pills and one quantity of cocaine.

October 11, 2022 Seizure of drugs from Casey LANDIS

151. Investigators obtained and reviewed Silver Reef Casino (Whatcom
 County) surveillance video of events that occurred on October 11, 2022. In this video,
 at approximately 8:38 PM, a male, whose appearance matches that of Casey LANDIS,
 appears to access a fanny pack and remove some money. LANDIS and a female,
 identified as Dannielle FREDRICKS, then appear to pay for an item at the cash register.
 At approximately 8:40 PM, LANDIS and the female walk away from the cash register
 and leave the fanny pack on the counter. Multiple customers walk up to the cash
 register to purchase items and no one is observed interacting with the fanny pack.

152. At approximately 9:03 PM, an individual is observed mentioning the
 fanny pack to a casino employee who takes possession of the fanny pack. The fanny
 pack is placed on the cashier's side of the counter before another casino employee takes
 custody of the fanny pack. Silver Reef Casino security conducted a routine lost and
 found inventory of the fanny pack and located suspected controlled substances. The
 controlled substances in the fanny pack were seized by Lummi Police Department.

153. A Lummi Police Department officer responded to the casino and located
 the female and male depicted in the video. The officers detained LANDIS and read
 LANDIS his Miranda Rights. When asked for identification, LANDIS provided an
 identification for another individual. LANDIS was subsequently taken into custody for

1 criminal impersonation. LANDIS subsequently provided his name and date of birth,
 2 officers confirmed LANDIS's identity based on that information.

3 154. During a search of LANDIS's person, officers located a small plastic
 4 baggie containing approximately 20 "M30" pills, consistent with fentanyl pills
 5 frequently seized in Whatcom County. A cell phone was also seized from LANDIS.

6 155. The fanny pack was determined to contain approximately 541 gross
 7 grams of suspected fentanyl pills 332.65 gross grams of suspected methamphetamine
 8 and 44.4 gross grams of suspected fentanyl powder. The suspected methamphetamine
 9 and suspected fentanyl both presumptively tested positive, using a non-contact
 10 handheld drug detection device, for the presence of methamphetamine and fentanyl,
 11 respectively.

12 Search of LANDIS's phone

13 156. On October 31, 2022, US Magistrate Judge Brian Tsuchida signed a
 14 search warrant authorizing the search LANDIS's cell phone.

15 157. Investigators identified that the phone was assigned phone number 360-
 16 303-3643 (TT23). Investigators located numerous messages related to LANDIS's
 17 residence and drug trafficking, some of those messages are discussed below.

18 158. On February 25, 2022, LANDIS exchanged the following messages with
 19 360-220-2229, saved in his phone as "Mom."

			We can meet up for lunch, that would be nice! Dad and I were going to take off around 1:00 tomorrow so can I pick you up around 11:30? We'll have time to talk and eat! Let me know if that works for you and where I should pick you up!!! Love you ♡
3602202229	Mom	Incoming	Does that work for you???
			Perfect!! 1512 iron street (off lakeway)
3602202229	Mom	Outgoing	See you then Love you

1			I'll see you tomorrow then!!! Looking forward to seeing you! Love you♡
2	3602202229	Mom	
3	3602202229	Mom	Do you want me to bring you some socks, underwear, shirts etc.???

4 159. In these messages, LANDIS provides 1512 Iron Street (**Target Location**
 5 **9**) to an individual, who is presumably his mother, as his address in February 2022.

6 160. On March 8, 2022, LANDIS exchanged the following messages with
 7 360-594-9268, saved in his phone as “Chris Hansen.”

8	3605949268	Chris Hansen	Outgoing	1512 iron st
9	3605949268	Chris Hansen	Outgoing	Go to the back door
	3605949268	Chris Hansen	Incoming	Okay

10 161. In these messages, LANDIS again provides “1512 iron st” (**Target**
 11 **Location 9**) as his address.

12 162. On March 8, 2022, LANDIS exchanged the following messages with
 13 360-499-5424, saved in his phone as “Kody.”

14	3604995424	Kody	Incoming	Hit me up we have the money destiny owes you and shit
15	3604995424	Kody	Outgoing	Right on.sorry phone was dead. I'm around
16	3604995424	Kody	Incoming	Where you at?
17	3604995424	Kody	Outgoing	1512 Iron street
18				One block east (towards the freeway from Nelson's Market) and one block north (towards king street McDonald's)
19	3604995424	Kody	Outgoing	Hit me up when you get to the stop sign at Iron and Gladstone
20	3604995424	Kody	Incoming	Ok
21	3604995424	Kody		MESSAGES SKIPPED FOR BREVITY
22	3604995424	Kody	Incoming	Do you want me to stay here or keep walking towards where you're at?
23	3604995424	Kody	Outgoing	Ok...coming out
24	3604995424	Kody	Incoming	How much money do you have
25	3604995424	Kody		I'll give you \$150 total so we owe you \$42 and then \$108 for you know
26	3604995424	Kody	Incoming	Ok...word. Just bagging it up.
27				In two minutes, go ahead and walk east one block to where the road ends.
28	3604995424	Kody	Outgoing	

1	3604995424	Kody	Incoming	K
2	3604995424	Kody	Incoming	Hey sorry can I just buy another \$100 worth while I'm here sorry bro
3	3604995424	Kody	Outgoing	Right now??
4	3604995424	Kody	Incoming	I already know I'll have to come back after I give destiny some and Dave and shit
5	3604995424	Kody	Incoming	If you can. Or I can come back later
6	3604995424	Kody	Outgoing	Sure...I'll be right back

163. In these messages, LANDIS provides “1512 Iron Street” (**Target Location 9**) as his address. Additionally, LANDIS and “Kody” discuss money that is owed to LANDIS. Based on training and experience I believe in these messages that when “Kody” said “Hey sorry can I just buy another \$100 worthwhile I'm here sorry bro” they were referring to obtaining an additional quantity of drugs.

164. On March 10, 2022, LANDIS exchanged the following messages with 360-276-6562, saved in his phone as “Black Rob.”

14	3602766562	Black Rob	Outgoing	Unfortunately no...#1 I'm just a guest at this place, but more importantly, me and my girl are going to be busy for a little while (if you know what I mean)
16	3602766562	Black Rob	Incoming	allgood is 1230 cool? what's up the job
17				So come to 1512 iron street, and knock on the front door.
18	3602766562	Black Rob	Outgoing	1230 cool

165. In these messages Landis provided “1512 iron street” (**Target Location 9**) as his address. LANDIS also said, “I’m just a guest at this place.” However, as discussed below, LANDIS continued to provide this as his address into September 2022.

166. On March 13 and 14, 2022, LANDIS exchanged the following messages with 360-770-9942, saved in his phone as “Tommy.”

25	3607709942	Tommy	Incoming	Will you give me that deal for a half roll?? Fifty at 225?
26	3607709942	Tommy	Outgoing	Yeah I can do that
27				MESSAGES SKIPPED FOR BREVITY
28	3607709942	Tommy	Outgoing	Come on through
	3607709942	Tommy	Incoming	Come through where?

1	3607709942	Tommy	Outgoing	Off lakeway. 1512 iron street
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2 167. Based on training and experience I know that “roll” is commonly used
 3 code for one hundred pills and a “half roll” would be 50 pills. LANDIS also provide
 4 “1512 iron street” (**Target Location 9**) as a location to meet.
 5

6 168. On June 10, 2022, LANDIS exchanged the following messages with 360-
 7 739-0044 (TT30), saved in his phone as “Anthony.” As discussed above, investigators
 8 believe that 360-739-0044 is used by Anthony GUNDERSON and that GUNDERSON
 9 is a redistributor for MARTINEZ LOPEZ.

10			It's not like that homie...and we've been 11 nothing but straight up cool to you. We've 12 paid for everything, repaid front, didn't 13 get phone number to one of your 14 connections cuz you asked us not to, 15 brought you your backpack without taking 16 a thing from it, turned down the money 17 kick down you tried giving us, etc. 18 As for helping us get our money up, we 19 both helped each other to get our money 20 up, and any help we've received from you 21 we've been so appreciative for. 22 This is the difficult part of doing business 23 with someone who you like and also 24 consider a friend. 25 But believe me, there was no intended 26 disrespect. 27 Why don't you come over here and talk 28 with us. We just got our own room two days ago.
21	3607390044	Anthony	Outgoing
22	3607390044	Anthony	Incoming
23			K where at?
24			MESSAGES SKIPPED FOR BREVITY
25			
26	3607390044	Anthony	Outgoing
27	3607390044	Anthony	Outgoing
28			1512 iron street

1 169. In these messages, LANDIS provides GUNDERSON with “1512 iron
 2 street” (**Target Location 9**) as LANDIS’s address.

3 170. On July 24, 2022, LANDIS and GUNDERSON exchanged the following
 4 messages.

5	3607390044	Anthony	Outgoing	I wanna buy some powder from you. Can you facilitate that?
6	3607390044	Anthony	Incoming	Which kind
7	3607390044	Anthony	Outgoing	Honestly I like both
8				I've had good purp and I've had good gray. I usually like purple. I would like a b for sure if you can do that. Thanks bud. Let me know
9	3607390044	Anthony	Outgoing	
10	3607390044	Anthony	Incoming	Okay
11	3607390044	Anthony	Incoming	I got either one

12 171. Based on training and experience, I believe that “powder” is code for
 13 fentanyl powder and “purple” is code for purple colored fentanyl powder, like that
 14 investigators seized from WISNIEWSKI, as discussed above.

15 172. On October 10, 2022, LANDIS and GUNDERSON exchanged the
 16 following messages.

17	3607390044	Anthony	Outgoing	We parked a couple of blocks away and are going to walk there now. Is that ok?
18	3607390044	Anthony	Outgoing	We're here down the road. What do you want us to do
19	3607390044	Anthony	Outgoing	Fuck pls hit us up cause we don't have shit.
20	3607390044	Anthony	Incoming	2100 I street
21	3607390044	Anthony	Incoming	Just come knock
22	3607390044	Anthony	Incoming	Why did you guys not just come here ?
23				

24 173. In these messages, GUNDERSON provides “2100 I street,” as discussed
 25 above, based on online mapping software “2100 I street” and 2100 Halleck Street
 26 (**Target Location 8**) are interchangeable to get to GUNDERSON’s **Target Location 8**.

27 174. On July 24, 2022, LANDIS exchanged the following messages with 360-
 28 577-7977, saved in his phone as “Tyson (erin's friend).”

1			I wanted to buy a g or two of the fetty powder, and I also have some business ventures I would like to discuss with you	
2	3605777977	Tyson (erin's friend)	Outgoing	MESSAGES SKIPPED FOR BREVITY
3	3605777977	Tyson (erin's friend)	Outgoing	Yes that's ok but I live off lakeway now
4	3605777977	Tyson (erin's friend)	Incoming	Oh u didn't say that bro wth. So where do I go
5	3605777977	Tyson (erin's friend)	Outgoing	Sorry, You never said you were coming. Get on freeway going north. Get off on the lakeway exit
6			Go straight at the stop sign after you exit. Then take next left onto Lincoln. Follow the road underneath the overpass until a 4-way stop. Go straight. Take left onto iron street. I live like 3 blocks up on iron street. 1215 iron street. I'll be outside when you get here to make it easier.	
7	3605777977	Tyson (erin's friend)	Outgoing	Btw...I'll toss a little gas money in as an apology for wasting your gas.
8	3605777977	Tyson (erin's friend)	Incoming	Ok where do I park bro
9	3605777977	Tyson (erin's friend)	Outgoing	I'm sitting in the front yard, you can park in front of me, behind a gold van
10	3605777977	Tyson (erin's friend)	Outgoing	Shit...it's 1512 Iron street

175. Based on training and experience I know that “fetty powder” is
 18 commonly used code for fentanyl powder and I believe that in these messages LANDIS
 19 is attempting to purchase fentanyl powder from “Tyson.” Additionally, LANDIS
 20 provided “1512 Iron street” (**Target Location 9**) as his address to meet to obtain the
 21 fentanyl powder.

176. On July 25, 2022, LANDIS exchanged the following messages with 360-
 22 224-6942, saved in his phone as “Brandon.”

24			K, what's your address? I have all of that
25	3602246942	Brandon	for you. Do you ever deal with Cashapp or PayPal, etc.?

1			Thanks homie!! My address is: 1512 iron street B'ham Wa 98225 Come on over whenever you want to meet. I can also meet you at lakeway Fred Meyers if it's easier
2	3602246942	Brandon	Outgoing

6 177. On September 7, 2022, LANDIS sent the following messages to
7 “Brandon.”

8	3602246942	Brandon	Incoming	What's your address?
9	3602246942	Brandon	Outgoing	1512 iron street

10 178. In both the messages on July 25, 2022, and September 7, 2022, LANDIS
11 provided “1512 iron street” (**Target Location 9**) as his address.

12 179. On September 14, 2022, LANDIS sent the following message to
13 “Brandon”

14			I'll hit you back in a few minutes. I just met victor, and I brought your name up. He's ok with working with you directly if you want to.
15	3602246942	Brandon	Outgoing

16 180. In these messages, LANDIS discussed meeting with “Victor.” As
17 discussed above, investigators know that MARTINEZ LOPEZ uses the name “Victor”
18 with his drug trafficking associates.

19 181. On July 26, 2022, LANDIS exchanged the following messages with 360-
20 820-5415, saved in his phone as “Kate.”

21	3608205415	Kate	Incoming	What's ur guy's address?	
22				MESSAGES SKIPPED FOR BREVITY	
23				We're walking home Meet there 1512 iron street	
24	3608205415	Kate	Outgoing		

25 182. Here, LANDIS again provides “1512 iron street” (**Target Location 9**) as
26 his address.

27 183. On July 28, 2022, LANDIS exchanged the following messages with 360-
28 919-9666 (TT15), saved in his phone as “Amy Hammer”. As discussed above,

1 investigators believe that 360-919-9666 is used by Amy HAMNER, the resident of
 2 **Target Location 5**, and a suspected drug redistributor for MARTINEZ LOPEZ.

3	3609199666	Amy Hammer	Incoming	How are you? Where you staying now? I need to see you
4	3609199666	Amy Hammer	Incoming	??
5				I'm at same place for one more week.
6				I'm good
7	3609199666	Amy Hammer	Outgoing	Victor is on his way to meet me rn
8				Ok cool. I might just actually get them from him then cuz I need to see him as well. Thanks budd
9	3609199666	Amy Hammer	Incoming	

10 184. As discussed above, investigators believe that “Victor” is the name used
 11 by MARTINEZ LOPEZ with his drug trafficking associates. In these messages
 12 HAMNER appears to confirm that she is an associate of MARTINEZ LOPEZ as well
 13 as LANDIS. Additionally, LANDIS said that “I’m at the same place for one more
 14 week.” However, as discussed above, as recently as September 7, 2022, LANDIS
 15 provided **Target Location 9** as his address to others.

16 185. As shown in the numerous messages described above, LANDIS
 17 frequently and consistently has provided **Target Location 9** as his address, even
 18 providing it to his mother in February 2022 and most recently in September 2022.
 19 Based on these messages, investigators believe that LANDIS resides at **Target**
Location 9.

20 186. On October 10 and 11, 2022, LANDIS exchanged the following messages
 21 with 360-982-8719 (TT10), saved in LANDIS’s phone as “Victor.” As discussed
 22 above, investigators believe that MARTINEZ LOPEZ uses the name “Victor” with his
 23 drug trafficking associates. Additionally, as discussed above, investigators believe that
 24 MARTINEZ LOPEZ is the user of TT10.

25	3609828719	Victor	Outgoing	Hey bud... I know it's a little bit later than normal, but do you happen to be in B'ham by any chance??
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1			I picked those two things up from you yesterday, but Supposedly there's a guy coming to meet me who wants to buy them both. That would mean I would need to hook up with you afterwards. I'm trying to find out exactly when he's going to be here. Then I'll know what I need to do with you. How much longer do you plan on being in B'ham??
2	3609828719	Victor	Outgoing
3	3609828719	Victor	Incoming
4	3609828719	Victor	Incoming
5	3609828719	Victor	Incoming
6	3609828719	Victor	Outgoing
7	3609828719	Victor	Incoming
8	3609828719	Victor	Outgoing
9	3609828719	Victor	Outgoing
10	3609828719	Victor	Incoming
11	3609828719	Victor	Outgoing
12	3609828719	Victor	Incoming
13	3609828719	Victor	Incoming
14	3609828719	Victor	Incoming
15	3609828719	Victor	Outgoing
16	3609828719	Victor	Incoming
17	3609828719	Victor	Incoming
18	3609828719	Victor	Incoming
19	3609828719	Victor	Outgoing
20	3609828719	Victor	Incoming
21	3609828719	Victor	Incoming
22	3609828719	Victor	Outgoing
23	3609828719	Victor	Incoming
24	3609828719	Victor	Outgoing
25	3609828719	Victor	Incoming
26	3609828719	Victor	Outgoing
27	3609828719	Victor	Incoming
28			

1			Perfect!!
2	3609828719	Victor	You have any idea of an ETA?
3			We believe it was Gary Artima
4	3609828719	Victor	Who robbed u
5			Hey bro...are you coming to B'ham today?
6	3609828719	Victor	Let me know. I'm going to pick up money
7			right now
8	3609828719	Victor	Outgoing
9			Hey bud...are you here yet?
10	3609828719	Victor	Incoming
11			Yes
12	3609828719	Victor	Incoming
13			I'm in town
14			Sweet!
15	3609828719	Victor	Wanna meet me at my place?
16			(I paid a blue to have the shit cleaned off
17	3609828719	Victor	the sidewalk!)
18	3609828719	Victor	Incoming
19			I'll be there at 10
20	3609828719	Victor	Incoming
21			Lol ok
22	3609828719	Victor	Outgoing
23	3609828719	Victor	Incoming
24			Going to u now
25	3609828719	Victor	Outgoing
26			Cool I'm there and the doors open for ya
27	3609828719	Victor	Incoming
28			K

187. Based on training and experience, I know that powder, is commonly used
 code for fentanyl powder, clear is commonly used code for methamphetamine, blue is
 commonly used code for fentanyl pill and boats is commonly used code for 1,000 pills,
 in this case likely fentanyl pills. When LANDIS said "I saved all three boats," I believe
 that LANDIS told MARTINEZ LOPEZ that he still had 3,000 fentanyl pills. When
 LANDIS said "Need clear and powder mostly" I believe that LANDIS was requesting
 methamphetamine and fentanyl powder from MARTINEZ LOPEZ. As discussed
 above, on October 11, 2022, Lummi Police Department recovered approximately 2499
 suspected fentanyl pills, 183.3 gross grams of suspected methamphetamine and 19.7
 gross grams of suspected fentanyl from a fanny pack abandoned by LANDIS. These
 drug quantities are consistent with the quantities and drug types discussed with
 MARTINEZ LOPEZ in the messages above.

188. Investigators located a video with a created date of September 21, 2022,
 that shows multi-color pills and blue pills, both which are consistent in appearance to

1 fentanyl pills seized by investigators in this and other investigations. This video had a
 2 recorded coordinates of 48.7497, -122.4663. According to Google Maps, these
 3 coordinate are approximately at **Target Location 9**. Investigators also observed
 4 multiple photographs of firearms with location information at or near **Target Location**
 5 **9**. According to NCIC, LANDIS has prior felony convictions which would make him
 6 ineligible to possess a firearm.

7 Location information for LANDIS's TT23

8 189. As discussed above, in September and October 2022, investigators
 9 obtained court authorization to obtain location information for LANDIS's TT23. As
 10 discussed above, TT23 was the phone number assigned to the phone seized from
 11 LANDIS.

12 190. Investigators received location information for LANDIS TT23 between
 13 September 12, 2022, and October 16, 2022, and started to receive data again on
 14 November 2, 2022. Investigators reviewed this information through November 15,
 15 2022. Location information for LANDIS's TT23 has not been particularly accurate
 16 with positional accuracy usually over 1000 meters and sometimes between 300 and
 17 1000 meters. While the location information is not precise enough to pinpoint
 18 LANDIS's whereabouts and investigators conducted an analysis of the location data,
 19 described below.

20 191. Between November 2 and November 15, 2022, location information
 21 indicated that TT23 was within approximately a half a mile of **Target Location 9**
 22 during the overnight hours on every night except for three nights or approximately 79%
 23 of the nights.

24 192. Between September 12, 2022 and October 16, 2022, location information
 25 indicated that TT23 was within approximately a half a mile of **Target Location 9**
 26 during the overnight hours one every night except for nine nights, or approximately
 27 75% of the nights.

193. Based on the messages and location information discussed above, investigators believe that LANDIS lives at **Target Location 9** and that there is probable cause to believe that evidence of LANDIS and MARTINEZ LOPEZ's drug trafficking activities will be found at **Target Location 9**.

Surveillance of Target Location 9

194. In November 2022, investigators conducted surveillance at **Target Location 9**. Investigators observed FREDRICKS walk out of **Target Location 9** smoke a cigarette before walking toward the rear of the residence. As discussed above, investigators observed video of FREDRICKS with LANDIS at the Silver Reef Casino on October 11, 2022, when the drugs were seized from a bag, abandoned by LANDIS at a casino counter. Based of messages reviewed by LANDIS, investigators believe FREDRICKS be LANDIS's paramour and to live with LANDIS at **Target Location 9**.

Location Information for MARTINEZ LOPEZ's Vehicles

195. Court authorized location information for MARTINEZ LOPEZ's various vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 9**¹² approximately 14 times, specifically on September 3, 13, 14, 21 and 25, 2022, October 8, 9, 12, 21, 24, 28 and 29, 2022, and November 5 and 7, 2022.

SUPPLEMENTAL INFORMATION ON TARGET VEHICLES

Target Vehicle 1 (TV1): Toyota Tacoma (WA/C88437V)

Target Vehicle 4 (TV4): white BMW 540 (WA/CCV6269)

Target Vehicle 5 (TV5): black Lexus IS (WA/BSU8484)

Target Vehicle 6 (TV6): white Dodge Durango (WA/BUJ0115)

Target Vehicle 7 (TV7): black BMW 440i sedan (WA/CEN6820)

Target Vehicle 9 (TV9): Mercedes Sedan (WA/CEX6393)

¹² Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 9** if it was within 300 feet of the residence.

1 196. According to the Washington State Department of Licensing (“DOL”),
2 **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESCA, at 1628 North
3 26th Street, Apartment 205 in Mount Vernon, Washington.

4 197. According to the DOL **Target Vehicle 4** is registered to ANJELICA J
5 LOPEZ VILLESCA at 6225 84th PL NE, Marysville, Washington.

6 198. According to the DOL **Target Vehicle 5** is registered to ENOC
7 MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

8 199. According to the DOL **Target Vehicle 6** is registered to Anjelica J
9 LOPEZ VILLESCA at 1628 North 26th Street Apartment 205, Mount Vernon,
10 Washington 98273.

11 200. According to the DOL **Target Vehicle 7** is registered to Manuel
12 GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

13 201. According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko
14 at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

15 202. As discussed throughout this affidavit, investigators have observed
16 MARTINEZ LOPEZ driving or riding as a passenger in numerous vehicles throughout
17 the course of this investigation, many of these instances were described in the
18 paragraphs above.

19 203. MARTINEZ LOPEZ, driving **TV1**, was observed meeting with
20 WISNIEWSKI on April 18, 2022, when fentanyl pills and other objects were seized
21 from WISNIEWSKI. Additionally, MARTINEZ LOPEZ was observed driving to
22 **Target Location 6** in October 2022 in **TV1**.

23 204. MARTINEZ LOPEZ was observed driving **TV4** on November 1, 2022,
24 when investigators believe that MARTINEZ LOPEZ met with WITTEVEEN and
25 investigators seized approximately 959 gross grams of methamphetamine and
26 approximately 346 gross grams of suspected fentanyl pills discarded by WITTEVEEN.
27 Investigators also observed MARTINEZ LOPEZ drive **TV4** to various target locations.

1 205. MARTINEZ LOPEZ was observed driving TV5 during the August 31,
2 2022, controlled purchase where investigators, utilizing a confidential source,
3 purchased approximately 197 gross grams of suspected fentanyl pills and 55 gross
4 grams of suspected heroin from MARTINEZ LOPEZ.

5 206. MARTINEZ LOPEZ was observed driving **TV6** on September 29, 2022,
6 when investigators followed MARTINEZ LOPEZ in **TV6** to OREIRO's residence
7 (**Target Location 4**). Investigators suspect that this was to provide OREIRO drugs or
8 obtain drug proceeds from OREIRO.

9 207. Investigators observed MARTINEZ LOPEZ as the operator of TV7 on
10 multiple occasions in October 2022. Washington DOL records indicate that TV7 is
11 registered to GARCIA MUÑOZ at **Target Location 3**. Additionally, court authorized
12 location data for TV7 indicates that TV7 has been at **Target Location 3** on at least one
13 occasion every day since the day the tracking device was installed, November 1, 2022,
14 through November 15, 2022.

15 208. MARTINEZ LOPEZ was observed driving TV9 during the November 9,
16 2022, controlled purchase of approximately 170 gross grams of suspected fentanyl pills.

17 209. In summary, investigators have observed MARTINEZ LOPEZ driving or
18 riding in virtually all of the listed **Target Vehicles** while conducting suspected drug
19 activities. Additionally, investigators have not been able to ascertain any pattern to
20 MARTINEZ LOPEZ's use of these vehicles and MARTINEZ LOPEZ appears to use
21 the vehicles interchangeably. Investigators are seeking authorization to search all of
22 MARTINEZ LOPEZ's vehicles for evidence of his drug trafficking activities.

KNOWLEDGE BASED ON TRAINING AND EXPERIENCE

25 210. Based upon my training and experience, and my discussions with other
26 experienced officers and agents experienced in drug and money laundering
27 investigations, I know the following:

1 a. During the execution of search warrants, it is common to find
 2 papers, letters, billings, documents, and other writings that show ownership, dominion,
 3 and control of vehicles, residences, and/or storage units.

4 b. It is common for drug dealers to secrete contraband, proceeds of
 5 drug sales, and records of drug transactions in secure locations within their vehicles,
 6 residences, and/or storage units for their ready access and to conceal them from law
 7 enforcement.

8 c. Narcotics traffickers maintain books, records, receipts, notes,
 9 ledgers, airline tickets, money orders, and other papers relating to the transportation,
 10 ordering, sale, and distribution of controlled substances. Narcotics traffickers
 11 commonly “front,” that is, provide on consignment, controlled substances to their
 12 clients. These books, records, receipts, notes, and ledgers, commonly known as “pay
 13 and owe sheets,” are maintained where traffickers have ready access to them.

14 d. Traffickers of controlled substances, and those who assist them,
 15 maintain and tend to retain accounts or records of their drug trafficking activities,
 16 including lists of drug quantities and money owed, telephone records including contact
 17 names and numbers, photographs, and similar records of evidentiary value. These
 18 items are generally kept in locations where drug traffickers believe their property is
 19 secure and will remain undetected from law enforcement, such as inside their homes
 20 and vehicles. Sometimes, these locations are not their primary residence, but instead
 21 used for the purposes of storing and distributing drugs.

22 e. Traffickers of controlled substances commonly maintain records
 23 reflecting names or nicknames, addresses, vehicles, and/or telephone numbers of their
 24 suppliers, customers and associates in the trafficking organization. Traffickers
 25 commonly maintain this information in books or papers as well as in cellular telephones
 26 and other electronic devices. Traffickers often maintain cellular telephones for ready
 27 access to their clientele and to maintain their ongoing narcotics business. Traffickers
 28 frequently change their cellular telephone numbers to avoid detection by law

1 enforcement, and it is common for traffickers to use more than one cellular telephone at
 2 any one time.

3 f. Traffickers maintain evidence of their criminal activity at locations
 4 that are convenient to them, including their residences and vehicles. This evidence
 5 often includes more than contraband and paraphernalia and includes financial records,
 6 records of property and vehicle ownership, records of property rented, records of
 7 storage facilities used to hide drugs or currency, and other documentary evidence
 8 relating to commission of, and proceeds from, their crimes. Narcotics traffickers
 9 sometimes take or cause to be taken photographs and/or video recordings of
 10 themselves, their associates, their property, and their illegal product, or have photo or
 11 video security systems that record images from their homes or property. These
 12 individuals usually maintain these photographs and recordings in their possession or at
 13 their premises, in a safe place. Such evidence may be kept at a safe location for a long
 14 time after the drug deal(s) to which they pertain are completed, if the location remains
 15 under the control of the trafficker.

16 g. Traffickers frequently maintain items necessary for weighing,
 17 packaging and cutting drugs for distribution. This paraphernalia often includes, but is
 18 not limited to, scales, plastic bags and other packaging materials, sifters, containers, and
 19 cutting/diluting agents and items to mask the odor of narcotics. Persons trafficking and
 20 using controlled substances frequently sell more than one type of controlled substance
 21 at any one time.

22 h. It is common for drug dealers to also be users of their product, and
 23 it is common for drug users to maintain paraphernalia associated with the use of
 24 controlled substances, such as syringes, pipes, spoons, containers, straws, and razor
 25 blades.

26 i. Traffickers frequently maintain records, books, notes, ledgers,
 27 travel documents, and other papers relating to the transportation and distribution of

1 controlled substances in locations convenient to them, such as their residences and
2 vehicles.

3 j. Traffickers often maintain weapons, including firearms and
4 ammunition, in secure locations such as their residences and vehicles, in order to
5 protect their drugs and drug proceeds.

6 k. Traffickers often have false identification documents and
7 identification documents in the names of others. Traffickers very often place assets in
8 names other than their own, or use fictitious names and identification, to avoid
9 detection of these assets by government agencies, while continuing to use these assets
10 and exercise dominion and control over them.

11 l. Drug trafficking is a cash business, often involving large amounts
12 of cash at any one time, so drug traffickers often have money counters.

13 m. A common method that drug traffickers use to distribute drugs is
14 through the use of passenger vehicles. Similarly, the proceeds of the sales of drugs are
15 sometimes transported back in the same manner. Vehicles used by drug traffickers are
16 often placed in fictitious or nominee names, and outfitted with concealed compartments
17 where the drugs and drug proceeds can be hidden to lessen the likelihood of
18 interdiction.

19 n. Persons involved in drug trafficking conceal in their residences caches of
20 drugs, large amounts of currency, financial instructions, precious metals, jewelry, and
21 other items of value and/or proceeds of drug transactions as well as evidence of
22 financial transactions relating to obtaining, transferring, secreting, or the spending of
23 large sums of money made from engaging in narcotics trafficking activities.

24 o. Unexplained wealth is probative evidence of crimes motivated by
25 greed, in particular, trafficking in controlled substances.

26 p. Illegal drug trafficking is a continuing activity over months and
27 even years. Illegal drug traffickers will repeatedly obtain and distribute controlled
28 substances on a somewhat regular basis, much as any distributor of a legitimate

1 commodity would purchase stock for sale, and, similarly, drug traffickers will have an
 2 "inventory," which fluctuates in size depending upon various factors, including the
 3 demand and supply for the product. I would expect the trafficker to keep records of
 4 their illegal activities for a period of time extending beyond the time during which they
 5 actually possesses illegal controlled substances, in order that they can maintain contact
 6 with his criminal associates for future drug transactions, and so that they can have
 7 records of prior transactions for which, for example, they might still be owed money, or
 8 might owe someone else money. These records are often created in code.

9 q. Drug trafficking is a cash business, and in order to escape notice
 10 from authorities for using unexplained income, or hide excessive cash from illegal
 11 activities, traffickers either keep large quantities of cash at home or other secure
 12 locations, such as safe deposit boxes, or convert the cash into other valuable assets,
 13 such as jewelry, precious metals, monetary instruments, or other negotiable forms of
 14 wealth. Records of such conversions are often stored where a trafficker lives or in other
 15 secure locations such as safe deposit boxes.

16 r. Money launderers often have banking records to include, but not
 17 limited to, deposit or withdrawal slips, bank statements, checks, or money orders. These
 18 items can be found in residences, vehicles, storage units, cellular phones, digital
 19 devices, among other locations. Some of these banking records may not be in their own
 20 name. Money launderers often have several accounts documented in some form, or
 21 instructions detailing how to handle each respective account. For example, they may
 22 have a list of accounts belonging to several different people with instructions for how
 23 much to deposit or withdraw from each and often maintain this information for long
 24 periods of time in their residences or safe deposit boxes.

25 s. Money launderers often have records or evidence related to how
 26 the proceeds were spent or concealed and often maintain this information for long
 27 periods of time in their residences or safe deposit boxes. Evidence may include jewelry
 28 and/or vehicles, as well as the contents of storage lockers, safe deposit boxes or bank

1 accounts. The use of bank accounts is a common money movement technique used by
 2 drug traffickers to receive payment for narcotics from customers outside of their
 3 geographic region. It is common for a trafficker to use several bank accounts for this
 4 purpose simultaneously in an attempt to avoid detection by the financial institutions
 5 and/or law enforcement. The use of multiple accounts, and the commingling of illicit
 6 funds with legitimate funds in particular, is often part of the plan to conceal the illegal
 7 activity or may be part of the overall integration mechanism by which the illicit funds
 8 are made to appear as part of the legitimate income so that only a small portion of or
 9 even none of the funds from an account are seized.

10 t. I know from my training and experience that Mexico-based DTOs
 11 frequently use various wire-remitter services and multiple senders to transfer money in
 12 relatively small increments to multiple recipients. DTOs employ such tactics in an
 13 effort to avoid triggering mandatory financial-reporting requirements of the wire-
 14 remitter operators and to avoid law enforcement detection. I also know from my
 15 training and experience that Mexico-based DTOs often use such wire transfers in order
 16 to quickly move a small portion of drug proceeds out of the United States and into the
 17 possession of DTO operatives and leadership in Mexico, with the bulk of the cash drug
 18 proceeds to follow later.

19 u. Based on my training and experience, I know that international
 20 money transfers among DTO members can be made through various digital money
 21 transfer services utilizing internet-connected digital devices such as desktop and laptop
 22 computers. In addition, those digital devices can be used by DTO members to access,
 23 store, send, and receive records related to such international money transfers.
 24 Accordingly, internet-connected digital devices owned or used by DTO members could
 25 harbor evidence of money laundering.

26 211. Based on my training and experience, and that of other investigators I
 27 have talked to, I also know that drug dealers use cellular telephones as a tool or
 28 instrumentality in committing their criminal activity, to include laundering their

1 proceeds. They use them to maintain contact with their suppliers, distributors, and
 2 customers. They prefer cellular telephones because, first, they can be purchased
 3 without the location and personal information that land lines require. Second, they can
 4 be easily carried to permit the user maximum flexibility in meeting associates, avoiding
 5 police surveillance, and traveling to obtain or distribute drugs. Third, they can be
 6 passed between members of a drug conspiracy to allow substitution when one member
 7 leaves the area temporarily. Since cellular phone use became widespread, every drug
 8 dealer I have contacted has used one or more cellular telephones for his or her drug
 9 business. I also know that it is common for drug traffickers to retain in their possession
 10 phones that they previously used, but have discontinued actively using, for their drug
 11 trafficking business. These items may be kept for months and months in a safe place
 12 controlled by the drug trafficker. Based on my training and experience, the data
 13 maintained in a cellular telephone used by a drug dealer is evidence of a crime or
 14 crimes. This includes the following:

15 a. The assigned number to the cellular telephone (known as the
 16 mobile directory number or MDN), and the identifying telephone serial number
 17 (Electronic Serial Number, or ESN), (Mobile Identification Number, or MIN),
 18 (International Mobile Subscriber Identity, or IMSI), or (International Mobile Equipment
 19 Identity, or IMEI) are important evidence because they reveal the service provider,
 20 allow us to obtain subscriber information, and uniquely identify the telephone. This
 21 information can be used to obtain toll records, to identify contacts by this telephone
 22 with other cellular telephones used by co-conspirators, to identify other telephones used
 23 by the same subscriber or purchased as part of a package, and to confirm if the
 24 telephone was contacted by a cooperating source.

25 b. The stored list of recent received, missed, and sent calls is
 26 important evidence. It identifies telephones recently in contact with the telephone user.
 27 This is valuable information in a drug investigation because it will identify telephones
 28 used by other members of the organization, such as suppliers, distributors and

1 customers, and it confirms the date and time of contacts. If the user is under
 2 surveillance, it identifies what number he called during or around the time of a drug
 3 transaction or surveilled meeting. Even if a contact involves a telephone user not part
 4 of the conspiracy, the information is helpful (and thus is evidence) because it leads to
 5 friends and associates of the user who can identify the user, help locate the user, and
 6 provide information about the user. Identifying a defendant's law-abiding friends is
 7 often just as useful as identifying his drug-trafficking associates.

8 c. Stored text messages are important evidence, similar to stored
 9 numbers. Agents can identify both drug associates, and friends of the user who likely
 10 have helpful information about the user, his location, and his activities.

11 d. Drug traffickers increasingly use applications on smart phones that
 12 encrypt communications such as WhatsApp, or applications that automatically delete
 13 messages, such as Snapchat, in order to avoid law enforcement monitoring or recording
 14 of communications regarding drug trafficking and/or money laundering. Evidence of
 15 the use of such applications can be obtained from smart phones, and is evidence of a
 16 smart phone user's efforts to avoid law enforcement detection.

17 e. Photographs on a cellular telephone are evidence because they help
 18 identify the user, either through his or her own picture, or through pictures of friends,
 19 family, and associates that can identify the user. Pictures also identify associates likely
 20 to be members of the drug trafficking organization. Some drug dealers photograph
 21 groups of associates, sometimes posing with weapons and showing identifiable gang
 22 signs. Also, digital photos often have embedded "geocode" or GPS information
 23 embedded in them. Geocode information is typically the longitude and latitude where
 24 the photo was taken. Showing where the photo was taken can have evidentiary value.
 25 This location information is helpful because, for example, it can show where
 26 coconspirators meet, where they travel, and where assets might be located

27
 28

f. Stored address records are important evidence because they show the user's close associates and family members, and they contain names and nicknames connected to phone numbers that can be used to identify suspects.

CONCLUSION

5 128. Based on the information set forth herein, there is probable cause to
6 search the above described **Target Locations, Target Vehicles and Target Devices**, as
7 further described in Attachment A, for evidence, fruits and instrumentalities, as further
8 described in Attachment B, of crimes committed by the individuals listed in this
9 affidavit and their coconspirators, specifically distribution of, and possession with
10 intent to distribute, controlled substances, in violation of Title 21, United States Code,
11 Section 841(a)(1); conspiracy to distribute controlled substances, in violation of Title
12 21, United States Code, Sections 841(a)(1) and 846; and/or money laundering and
13 conspiracy to launder money, in violation of Title 18, United States Code Section 1956
14 and 1956(h).

~~Joseph Cheng
Special Agent
Drug Enforcement Administration~~

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on the 28th day of November, 2022.


MICHELLE L. PETERSON
United States Magistrate Judge

1 **ATTACHMENT A**

2 **PROPERTY TO BE SEARCHED**

3

4 The areas to be searched includes all areas at that location where the Items to Be
5 Seized, listed in Attachment B, could be found.

6 For physical locations, this includes all areas within and surrounding the primary
7 residence/location, including all rooms, attics, crawlspaces, basements, storage areas,
8 containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding,
9 patios, balconies, yards, secure locations (such as safes), and vehicles located within
10 said property or within the residence/location described below.

11 For vehicles to be searched, this includes all areas of the vehicle, all
12 compartments, and all containers within that vehicle, whether locked or not.

Residences

Target Location 2 (TL2): 6225 84th Place Northeast, Marysville, Washington.

Target Location 2 is a single floor single family residence. The numbers 6225 are affixed vertically to a post near the front door. The red front door faces west into the cul-de-sac. The house is light blue and cream colored with white trim.



1 **Target Location 3 (TL3): 18111 25th Avenue Northeast, Apartment FF105,**
2 **Marysville, Washington.**

3 **Target Location 3** is a two story middle unit in a multi-residence townhome
4 building. Target Location 4 has tan siding with white and gray trim. The garage door
5 is mixed white and gray in color and faces east toward Gregory Landing Lane.
6 "FF105" is affixed to the building next to the garage door. The front door faces south.
7



1 | **Target Location 4 (TL4): 3374 Robertson Road, Bellingham, Washington.**

2 | **Target Location 4** is on the east side of Robertson Road and is a two story
3 | single family residence. The residence is blue/gray in color with white trim. The
4 | numbers 3374 are affixed above the garage doors. A double and single garage door and
5 | a mostly glass front door face Robertson Road.



1 **Target Location 5 (TL5): 2100 Alabama Street Apartment V8, Bellingham,**
2 **Washington.**

3 **Target Location 5** is an apartment complex named the Crimson Hills
4 Townhomes at the intersection of Alabama Street and Woburn Street. Apartment V8 is
5 two stories and faces west toward Valencia Street. V8 is affixed to a post next to a
6 wooden gate across the entry to the residence.



1 | **Target Location 6 (TL6): 1511 Willowbrook Place, Bellingham, Washington.**

2 | **Target Location 6** is a single family residence at the end of Willowbrook Place.

3 | The black numbers 1511 are affixed to a white board next to the front door. The house
4 | is tan in color with white trim. The red front door and white garage door both face east
5 | toward Willowbrook Place.



1 | **Target Location 7 (TL7): 4076 Jones Lane, Bellingham, Washington**

2 | **Target Location 7** is a two story single-family residence that is dark in color
3 | with light colored trim. **Target Location 7** is at the end of a long driveway off of Jones
4 | Lane. A dark color garage door and dark colored front door with glass panes face Jones
5 | Lane to the west. A small outbuilding sits at the end of the driveway nearest to Jones
6 | Lane.



1 **Target Location 8 (TL8): 2100 Halleck Street, Bellingham, Washington**

2 Target Location 8 is a single family single floor residence, cream in color with
3 a brown roof and is located on the east side of the intersection of I Street and Halleck
4 Street. The number 2100 are affixed next to the front door of the residence that faces
5 Halleck Street. The front door is brown in color.



1 | **Target Location 9 (TL9): 1512 Iron Street, Bellingham, Washington.**

2 | **Target Location 9** is a one-story single family residence located on the east side
3 | of Iron Street. The house is gray/blue in color with white trim and a white with glass
4 | panels front door facing west. The number 1512 are affixed to the residence next to the
5 | front door.



22 | For this location, search is only authorized for areas that CASEY LANDIS has direct
23 | access, including his personal room or rooms and any common areas (including
24 | bathrooms, kitchen, and living areas) to which he has access. Search is not authorized
25 | for rooms that CASEY LANDIS does not have direct access (including bedrooms
26 | associated with other individuals).

Vehicles

Target Vehicle 1 (TV1): a 2019 Toyota Tacoma bearing Washington license plate C88437V (hereinafter, “**Target Vehicle 1**”). According to the Washington State Department of Licensing (“DOL”), **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESCA, at 1628 North 26th Street, Apartment 205 in Mount Vernon, Washington.

Target Vehicle 4 (TV4): a 2017 white BMW 540 sedan bearing Washington license plate CCV6269 (hereinafter, “**Target Vehicle 4**”). According to the DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESCA at 6225 84th PL NE, Marysville, Washington.

Target Vehicle 5 (TV5): a 2012 black Lexus IS sedan bearing Washington license plate BSU8484 (hereinafter, “**Target Vehicle 5**”). According to the DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

Target Vehicle 6 (TV6): a 2015 white Dodge Durango bearing Washington license plate BUJ0115 (hereinafter “**Target Vehicle 6**”). According to the DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESCA at 1628 North 26th Street Apartment 205, Mount Vernon, Washington 98273.

Target Vehicle 7 (TV7): a 2017 black BMW 440i sedan, bearing Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

Target Vehicle 9 (TV9): a 2016 Mercedes sedan, bearing Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for and seize the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and Possession with Intent to Distribute Controlled Substances, in violation of Distribution of, and Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. § 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, and Felon in Possession of a Firearm, in Violation of 18 U.S.C. 922, including but not limited to the following:

1. Controlled Substances: Including but not limited to marijuana and cocaine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, “pay/owe sheets” with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property

occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

- d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
- e. Collection accounts: statements and other records.
- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and

other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries, iPhones and other smartphones may be seized but may only be searched pursuant to a subsequent warrant.